

DOCKET NO: UWY-CV-18-6046436-S :	:	SUPERIOR COURT
	:	
ERICA LAFFERTY, ET AL.,	:	COMPLEX LITIGATION DOCKET
	:	
VS.	:	AT WATERBURY
	:	
ALEX EMRIC JONES, ET AL.	:	SEPTEMBER 14, 2021

DOCKET NO: UWY-CV-18-6046437-S :	:	SUPERIOR COURT
	:	
WILLIAM SHERLACH,	:	COMPLEX LITIGATION DOCKET
	:	
VS.	:	AT WATERBURY
	:	
ALEX EMRIC JONES, ET AL.	:	SEPTEMBER 14, 2021

DOCKET NO: UWY-CV-18-6046438-S :	:	SUPERIOR COURT
	:	
WILLIAM SHERLACH, ET AL.,	:	COMPLEX LITIGATION DOCKET
	:	
VS.	:	AT WATERBURY
	:	
ALEX EMRIC JONES, ET AL.	:	SEPTEMBER 14, 2021

**DEFENDANTS' OPPOSITION TO MOTION FOR SANCTIONS BASED
ON WEB AND SOCIAL MEDIA DATA AND ANALYTICS**

Plaintiffs filed a frivolous and sanctionable motion themselves seeking sanctions against Defendants where they make material misrepresentations, lying to the Court about discovery and Defendants' compliance therewith. They are running from a court's impending consideration, at long last, of a dispositive motion, which they have avoided for over three years through interposed remand and discovery proceedings. Instead of facing up to having raised meritless claims, they are attempting to obtain an improper default sanction through an unethical motion.

Defendants Alex Jones, Free Speech Systems, LLC, Infowars, LLC, Infowars Health, LLC, and Prison Planet TV, LLC, object to Plaintiffs' misnamed and misguided Motion for Sanctions Based on the Jones Defendants' Failure [sic] to Produce Web and Social Media Data and

Analytics. (Lafferty Entry No. 450.00). Analytics have been produced and otherwise made available for inspection as required. And, because Plaintiffs seem to think baseless sanctions motions should substitute for having a viable case, Plaintiffs should themselves be sanctioned.

1.0 Legal Standard

In order to sanction a litigant, the standard the Court must use is that the order allegedly not complied with “must be reasonably clear...the record must establish that the order was in fact violated...[and] the sanction imposed must be proportional to the violation.” *Lafferty v. Jones*, 336 Conn. 332, 374 (2020). Plaintiffs do not meet this standard. “Trial court judges face great difficulties in controlling discovery procedures which all too often are abused by one side or the other[.]” *Mulrooney v. Wambolt*, 215 Conn. 211, 223, 575 A.2d 996 (1990). The Court should not suborn Plaintiffs’ abuse of discovery.

2.0 No Sanctions are Appropriate Where Defendants Fully Complied

Plaintiffs blatantly misrepresent to the Court Defendants’ so-called failure to produce Google Analytics. As the Court is aware, and had previously adjudicated, Defendants initially produced a printout that was not deemed to be “full and fair compliance”. (Order of June 10, 2019, Lafferty Entry No. 255.10). Utterly absent from Plaintiffs’ motion is any discussion of the production that was made exactly one week later.

On June 15, 2019, Attorney Mattei provided Defendants’ counsel with “guidance concerning how to extract data from google analytics for production. These instructions are lengthy because they include step-by-step images and screen grabs that we hope will be helpful.” This email included a 115 page PDF attachment setting forth how they wanted dozens of categories of data produced. See **Exhibit A**. Two days later, by email of June 17, 2019, Defendants’ counsel produced (in a .zip file attachment) the files that resulted from following guidance. See **Exhibit**

B; *see also*, **Exhibit C**, Declaration of Michael Zimmermann. These files were also on the USB stick that Defendants’ counsel attempted to deliver by hand, in Court, on June 18, 2019, that Plaintiffs’ counsel refused. *See* Transcript of Hearing of June 18, 2019, at 17:1-5.

A comparison of the June 15, 2019, “guidance” document and the affidavit of Plaintiffs’ purported expert, Mr. Campbell, at paragraphs 9-10, shows that the “export” Mr. Campbell indicates is possible is exactly what Free Speech Systems did and produced on June 17, 2019. Mr. Campbell’s affidavit, like the motion itself, is silent as to the June 17, 2019, production. It appears that Plaintiffs withheld this crucial information from their expert just as they did from the Court.

While Mr. Campbell does state that some data from Google Analytics can be exported without an Analytics 360 account, and Defendants do not contest this, exporting some data in specific reports (such as the ones produced on June 17, 2019 per the June 15 guidance) is not the same thing as exporting the *entire* database. As the image in the Campbell affidavit shows, it is a Report that might be exported. Mr. Campbell offers nothing to suggest Google’s own website is wrong when it states that “access to raw data” *i.e.* the underlying database itself, is only available to paid Analytics 360 users, and Plaintiffs offer no evidence to suggest Defendants are otherwise able to export the entire database. Thus, the need for the sandbox approach where the only other way to permit Plaintiffs to inspect would be to tender the login credentials, which the Court adjudicated was *not* something Free Speech Systems was required to do.¹

Defendants raised the inability to produce the “entire Google analytics account” with the Court on June 2, 2021. *See* Transcript of Hearing of June 2, 2021 at 6:10-13. Plaintiffs’ counsel referenced a possible “data acquisition protocol[]” (*id.* at 9:22-23), but the only “protocol” ever provided was the one on June 15, 2019, that was fully complied with.

¹ Plaintiffs, as expected, attempt to lump all defendants in together in a dishonest attempt to abuse the notion of discovery sanctions. Plaintiffs offer nothing to suggest any other defendant has a Google Analytics account.

The Order is otherwise not reasonably clear. The substance of the June 10, 2019 order is:

The 35 page Google Analytics print out produced in response to production requests 15-17 is simply not full and fair compliance. The production requests are not limited to printed reports, or data that the defendants admit to relying upon. The sworn affidavit of David Jones refers to the Jones defendants' valuable, confidential, and proprietary information relating to sales and marketing, the significant resources that have been invested into developing their business and marketing strategies, and the nondisclosure agreements that the defendants routinely require their employees to sign. The May 15 and 16 Austin depositions confirm that the Google Analytics account is accessed and utilized by some employees of the defendants. The plaintiffs are entitled to the data pursuant to the court's discovery orders.

The subject requests for production on which the order is based seek “all marketing data or analytics”. To the extent “entitled to the data” means the specific reports Plaintiffs requested on June 15, 2019, those were produced. If “entitled to the data” means an export of the raw data (which is what “all marketing data or analytics” means in its broadest sense, Defendants are unable to do that (and Mr. Campbell offers nothing to suggest otherwise), but have provided a sandbox mechanism for Plaintiffs to inspect (which they have declined).² If it means something else, then no one has identified what other data was not produced; the motion for sanctions itself does not identify specifically what was not produced, but rather suggesting that some nondescript data could be produced and, as a result, the Order cannot be considered “reasonably clear”.

In short, Defendants have provided Plaintiffs with everything they could provide and offered a means to inspect what they have to ability to outright produce based upon their best understanding of the Court’s non-specific order upon Plaintiffs’ various requests. There is no basis to issue sanctions regarding Google Analytics production.

² Although Plaintiffs express some concern that the sandbox approach would allow Defendants to know what they are searching, it is no different than when a litigant enters a storeroom of boxes and the other party knows which boxes were opened.

Neither is there any basis on which to sanction Free Speech Systems regarding social media analytics. Defendants were ordered to make supplemental production by June 28, 2021. They did so at the corporate representative deposition less than a week prior, which Plaintiffs acknowledge. It is unclear what Plaintiffs mean by not having been “formally produced in discovery”—how much more formal could it be when done at a live deposition? The Practice Book only requires that a party whose objection to a discovery request was overruled “shall comply with the request at a time set by the judicial authority.” Practice Book § 13-4(j). There is nothing “formal” or “informal” written into the rule. Free Speech Systems, the only defendant with any form of social media analytics, complied with the request prior to the June 28, 2021, deadline. Prior non-production was inadvertent, as the reports at issue were not previously identified by Defendants where it was not kept in a centralized data storage. See Exhibit C, Affidavit of Michael Zimmermann. Plaintiffs identify no social media analytics that were withheld. Moreover, it is hardly clear that Defendants were required to produce this—Plaintiffs would presumably bootstrap in Request 15, which includes “web traffic data concerning...[any] social media...profile”. Plaintiffs characterize the reports in the motion as “yearly traffic data”—but social media is not beholden to the World Wide Web, meaning that the analytics are not necessarily “web traffic data” where it cannot be disambiguated from app-based traffic data. Thus, the non-clear order was not violated and there is no basis for issuing sanctions.

3.0 Sanctions are Not Warranted

The sanctions requested are wholly disproportionate. There was no non-compliance. Google Analytics and social media analytics were produced to the fullest extent by the June 28, 2021, deadline, and what could not be produced is available for inspection. Plaintiffs have suffered

no prejudice—they received the Google Analytics they sought *over two years ago* and they had the full and fair opportunity to depose the corporate representative over the social media analytics.

Moreover, there can hardly be prejudice where the underlying discovery bears little relevance to the claims and defenses at issue. Plaintiffs have had whatever analytics there possible could have been regarding Sandy Hook related materials. Plaintiffs cannot identify a single piece of information they actually need to attempt to prove their case.

There is no evidence to suggest Mr. Jones or Free Speech Systems ever used these analytics to drive content; witness after witness has testified that programming is based on the news of the day and the facts they possess, with articles linking to sources, and care taken to get the facts right. Even former employees will testify (as Kurt Nimmo did at his recent deposition) that getting the facts right in the reports is imperative across Infowars, and no one wants to get chewed out by Mr. Jones if published information is erroneous.

Other litigation involving Defendants elucidates the absence of prejudice. In a defamation case arising out of the Charlottesville Unite the Right rally, the Federal court did allow some discovery into “specific profit motive”, permitting requests targeted to revenue directly generated by the two videos at issue and to other publications specifically concerning the plaintiff, but denied the type of overbroad discovery at issue here, stating:

Profit motive is insufficient, on its own, to show actual malice. The “fact that the defendant published the defamatory material in order to increase its profits [cannot] suffice to prove actual malice.” *Harte-Hanks Comm’ns, Inc. v. Connaughton*, 491 U.S. 657, 667 (1989) (“If a profit motive could somehow strip communications of the otherwise available constitutional protection, our cases from *New York Times* to *Hustler Magazine* would be little more than empty vessels.”); *see also Reuber v. Food Chem. News, Inc.*, 925 F.2d 703, 716 (4th Cir. 1991) (*en banc*) (“The cases from *New York Times v. Sullivan* onward teach that evidence of a defendant printing material to increase its profits does not suffice to prove actual malice.” (*citing Harte-Hanks*, 491 U.S. at 667)). Moreover, Plaintiff is not entitled to discovery into Defendants' general profit motives or into Defendants' general profits from advocating controversial

positions. *Reuber*, 925 F.2d at 716 (“[I]t is hardly unusual for publications to print matter that will please their subscribers; many publications set out to portray a particular viewpoint or even to advance a partisan cause. Defamation judgments do not exist to police their objectivity; the First Amendment presupposes that a veritable medley of opposing voices is better suited to the search for truth.”).

...

The Jones Ownership Interrogatory is not reasonably targeted at discerning a profit motive for publications specifically concerning the statements at issue in this case. See Fed. R. Civ. P. 26(b)(1). Rather, it is expansive and seeks information into Defendant Jones's general business dealings. Such information may provide insight into Jones's motives to advocate controversial positions, but that information has not been shown to be relevant to the actual malice inquiry. Accordingly, Plaintiff's motion to compel is DENIED as to the Jones Ownership Interrogatory.

Gilmore v. Jones, Civil Action No. 3:18-cv-00017, 2021 U.S. Dist. LEXIS 4382, at *20-22 (W.D. Va. Jan. 8, 2021). The analytics at issue are analogous to Gilmore's attempts to obtain discovery regarding general business dealings and are far broader than merely being about Sandy Hook. There cannot be prejudice to Plaintiffs for the non-production of immaterial information, even if the Court at one point thought the requests for production were properly limited.

To the extent the Court is blinded by the misrepresentations and omissions of Plaintiffs' counsel, Free Speech Systems's production was innocent of any intent to obfuscate or delay proceedings. The extreme sanction of default is not warranted. A dispositive sanction is a sanction of last resort. See *Ridgaway v. Mount Vernon Fire Ins. Co.*, 328 Conn. 60, 71-73, 176 A.3d 1167, 1174-75 (2018). It must be “the only reasonable remedy available to vindicate the legitimate interests of the other party and the court.” (Citation omitted; internal quotation marks omitted.) *D'Ascanio v. Toyota Industries Corp.*, 309 Conn. 663, 670-72, 72 A.3d 1019 (2013). Default is not a reasonable remedy. If they want to re-depose Free Speech Systems's social media manager, they are free to do so.

However, they had not sought to do so in the two months since the social media analytics reports were provided because the so-called discovery violations are a red-herring. Defendants have gone above and beyond what any other defamation defendant not named “Alex Jones” or “Infowars” would have to do in similar litigation. Plaintiffs are resorting to lying about putative discovery violations because, ultimately, they have no viable claims against Defendants. The motion for sanctions must be denied.

Dated: September 14, 2021

Respectfully submitted,
ALEX EMRIC JONES, INFOWARS, LLC,
FREE SPEECH SYSTEMS, LLC,
INFOWARS HEALTH, LLC, PRISON
PLANET TV, LLC

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CERTIFICATION

I hereby certify that a copy of the above was mailed or electronically delivered on this 14th day of September 2021 to all counsel and pro se parties of record and that written consent for electronic delivery was received from all counsel and pro se parties of record who were electronically served including:

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Exhibit A

June 15, 2019 Email Correspondence and Step-by-Step Guide

From: Christopher Mattei <CMattei@koskoff.com>

Date: Saturday, June 15, 2019 at 2:18 PM

To: Norm Pattis <NPattis@pattisandsmith.com>, Kevin Smith <KSmith@pattisandsmith.com>, Zach Reiland <zreiland@pattisandsmith.com>

Cc: Matthew Blumenthal <mblumenthal@koskoff.com>, "Alinor C. Sterling" <ASterling@koskoff.com>

Subject: Data production

Counsel,

Per your request, we are providing you with guidance concerning how to extract data from google analytics for production. These instructions are lengthy because they include step-by-step images and screen grabs that we hope will be helpful.

Please note that the instructions are for both the main site and the ecommerce site. The ecommerce site is hosted on a different URL from the main site. Therefore, all downloading of the data using the instructions will have to be pulled for each URL separately.

Our IT team will be available tomorrow and Monday to assist in any transfer of data.

Chris

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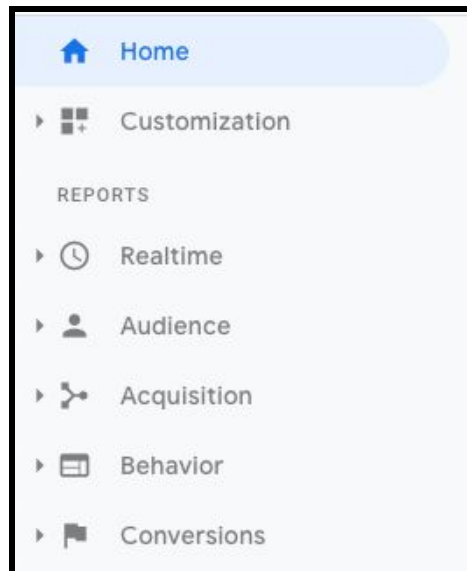
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Step By Step.pdf
971K

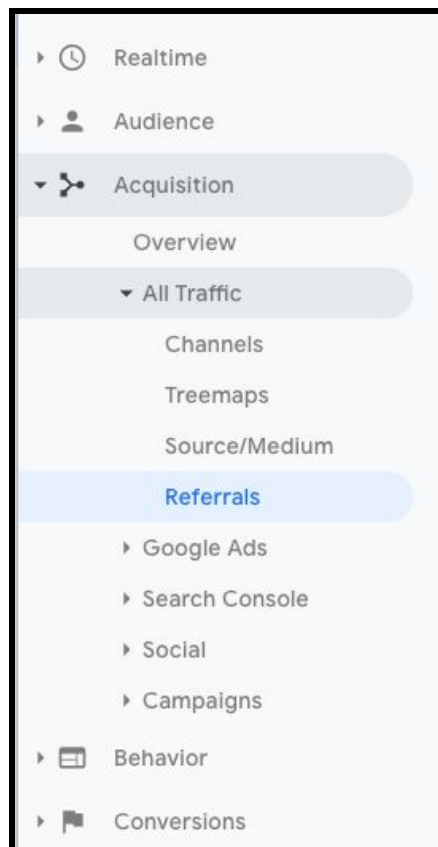
Acquisition, All Traffic, Source/Medium

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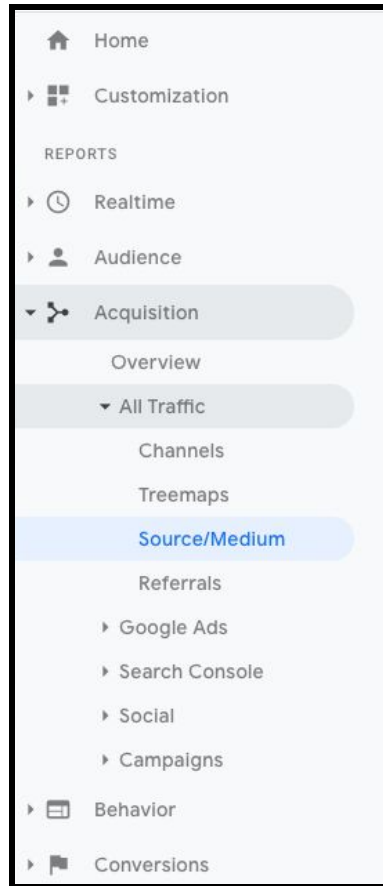
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02. Click on All Traffic



a.

03. Click on Source/Medium



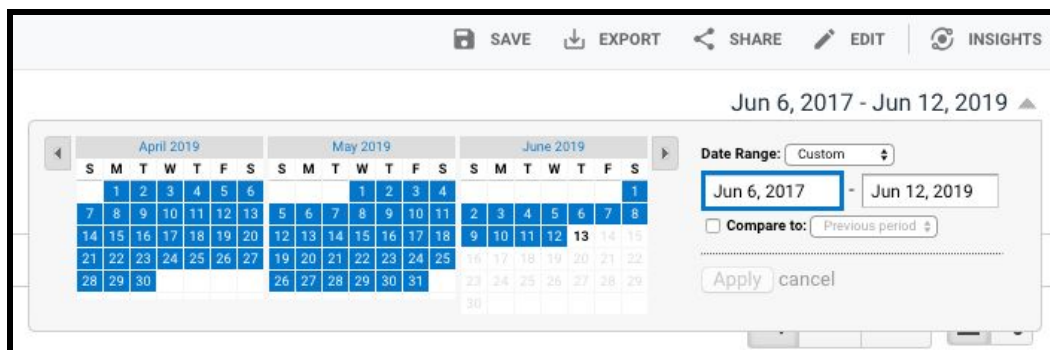
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04. Click on the Date Rang

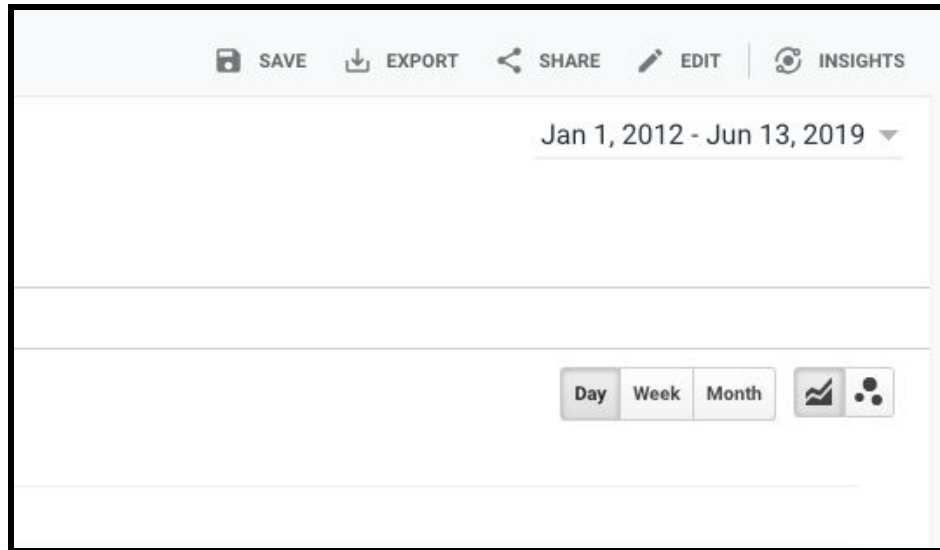


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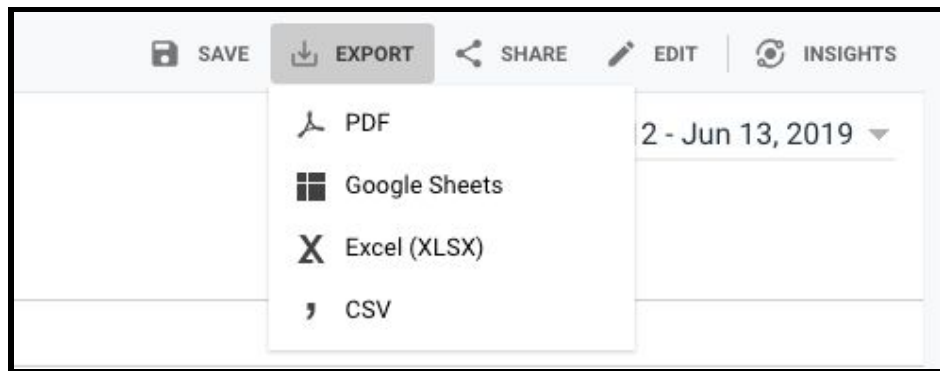


06. Click on Export



07.

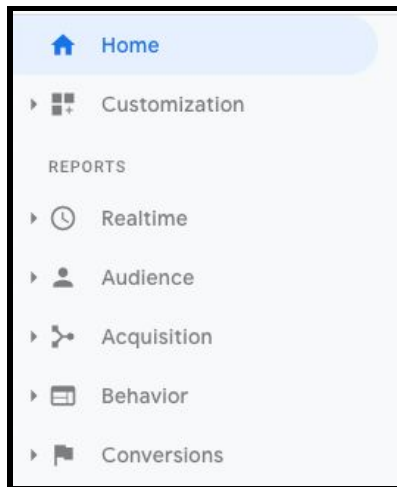
08. Click on Excel (XLSX)



09.

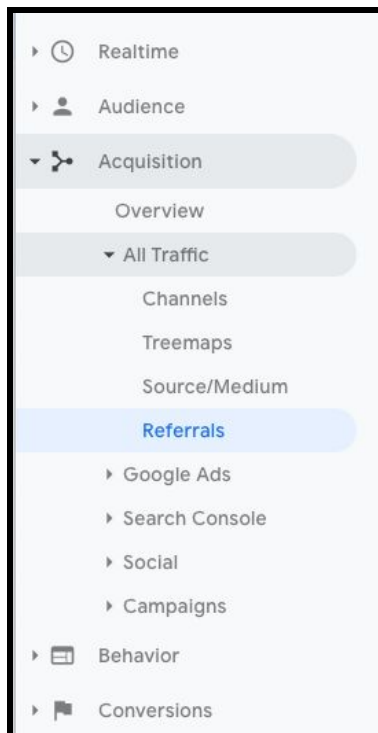
Acquisition, All Traffic, Source/Medium (Keywords)

1. Click on Acquisition



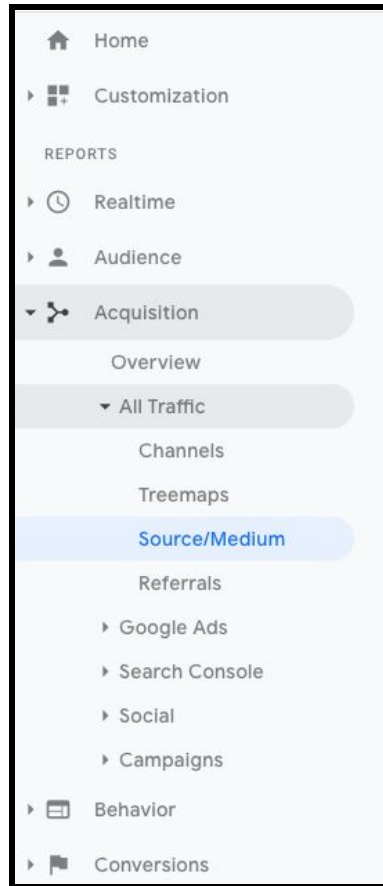
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2. Click on All Traffic



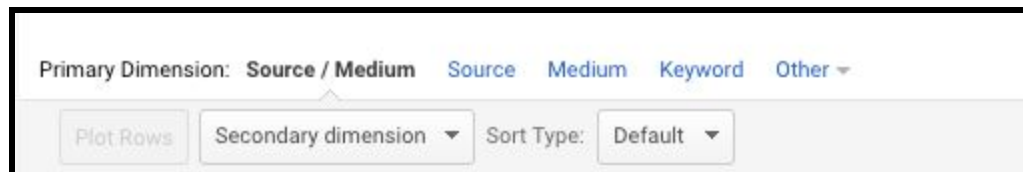
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3. Click on Source/Medium



a.

4. Click on Keyword



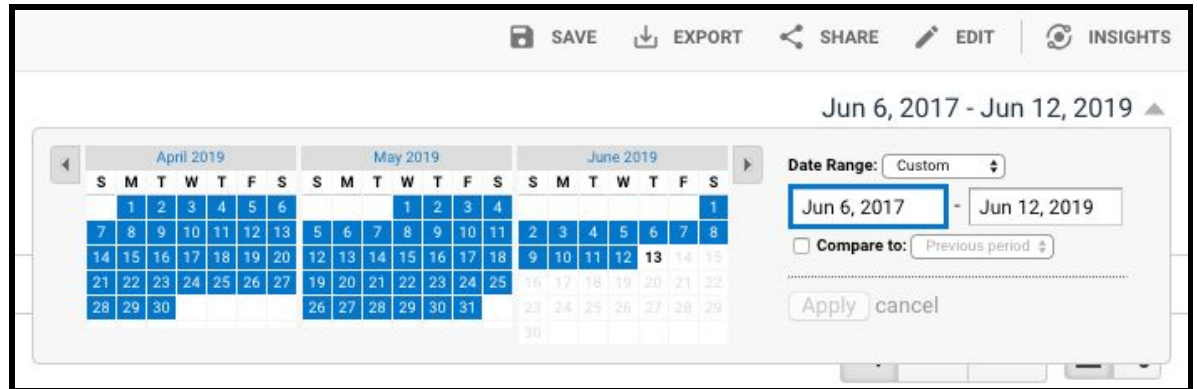
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5. Click on the Date Range



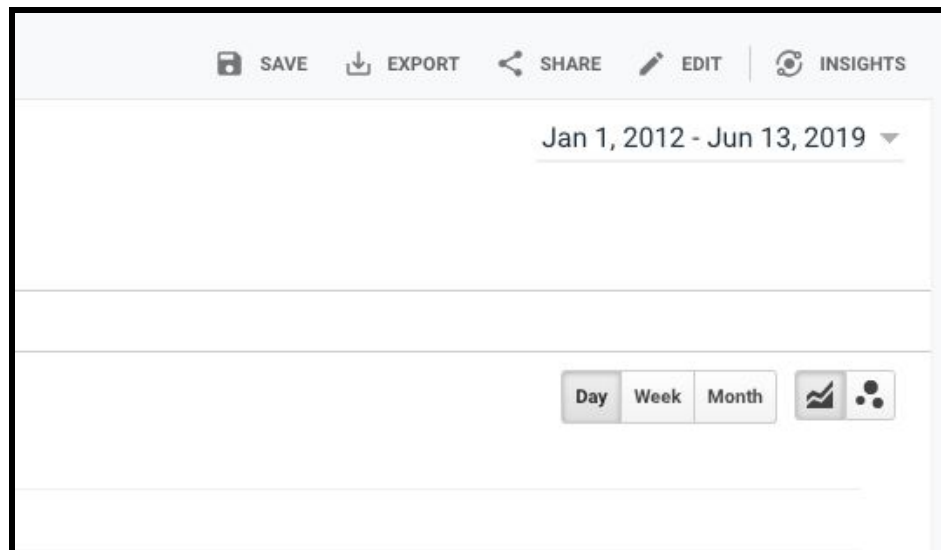
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6. Update Date Range to January 1, 2012 - December 31, 2019



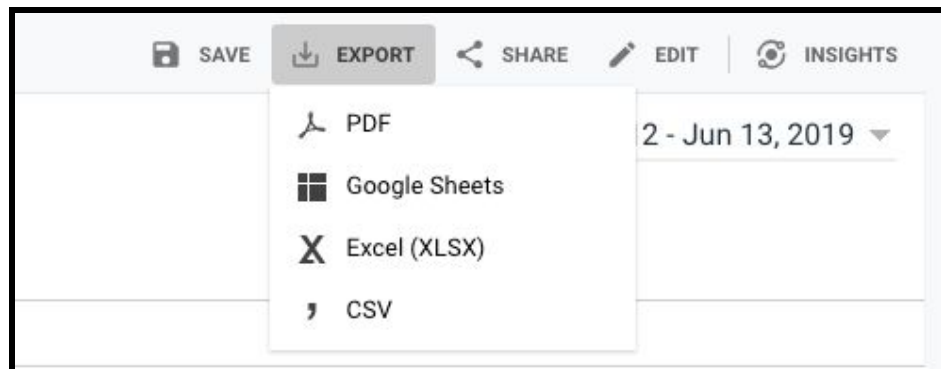
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7. Click on Export



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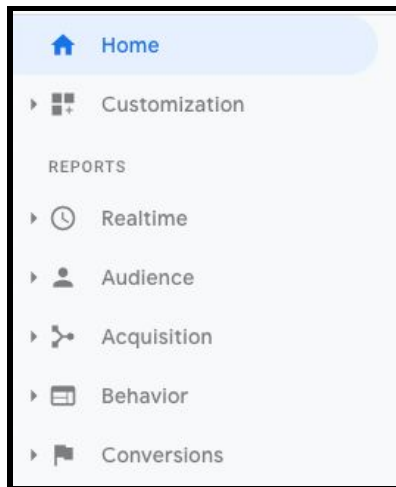
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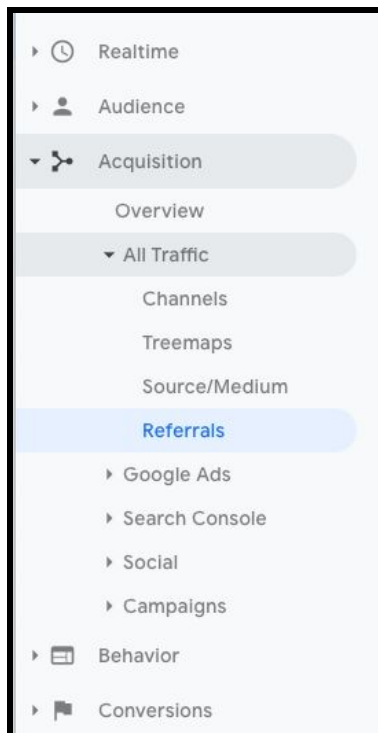
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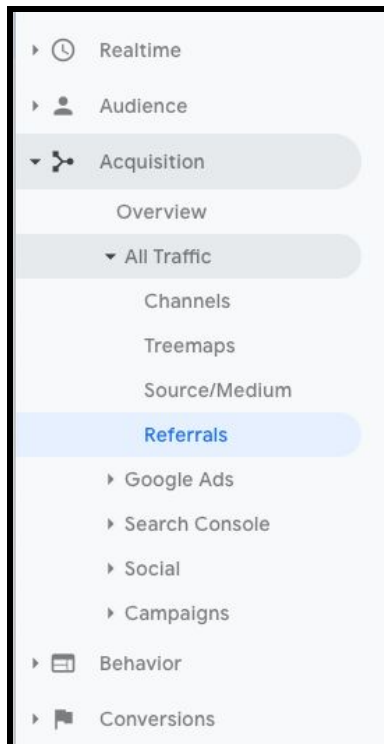
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2. Click on All Traffic



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3. Click on Referrals



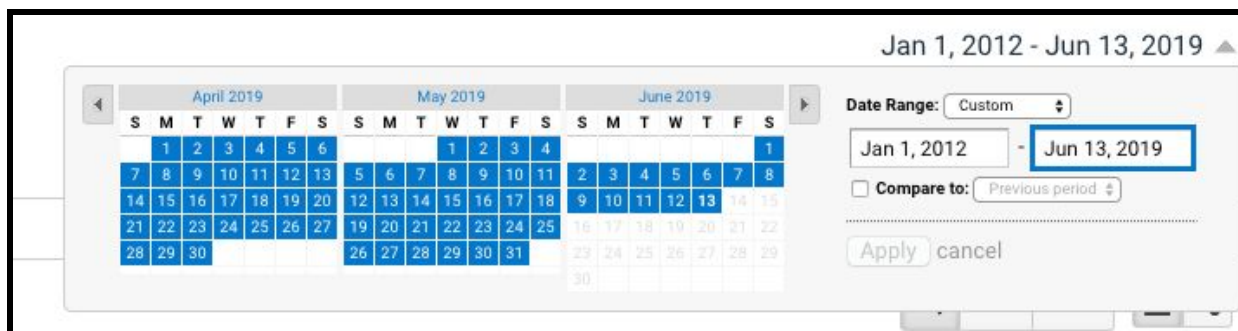
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4. Click on the Date Range



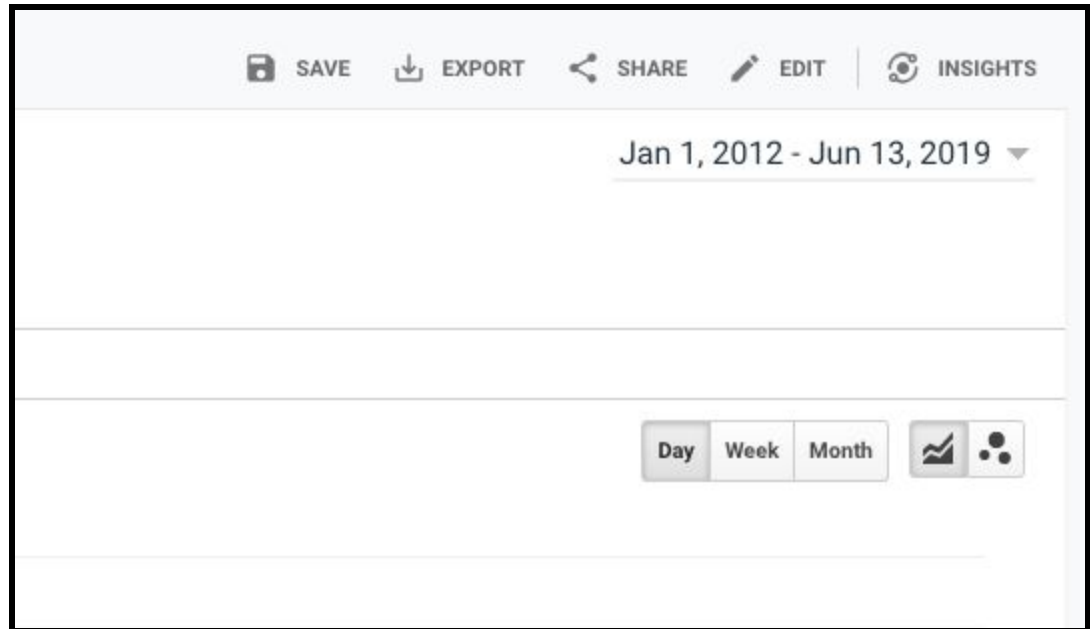
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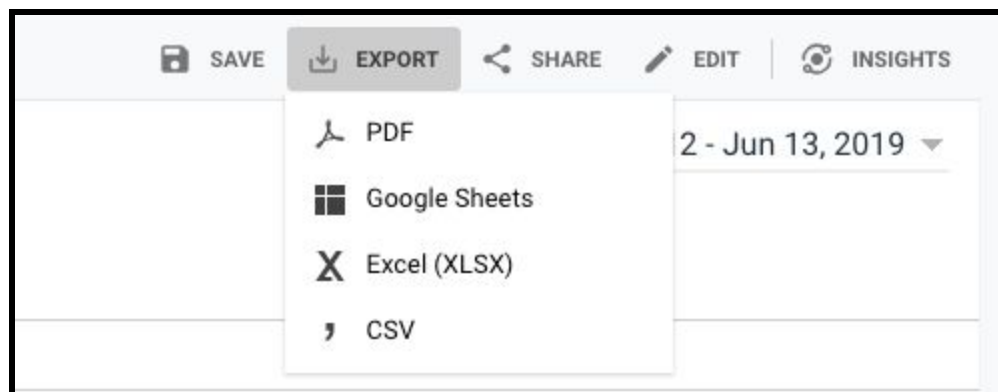
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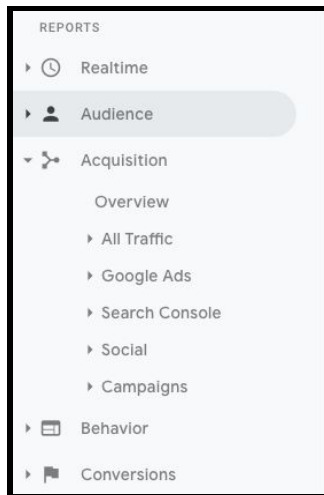
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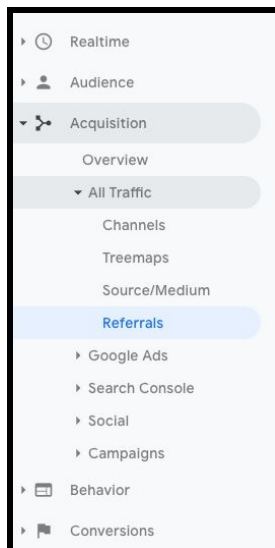
Acquisition, All Traffic, Referrals (Landing Page)

1. Click on Acquisition



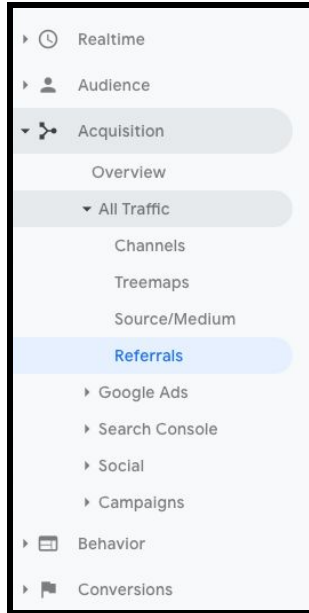
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2. Click on All Traffic



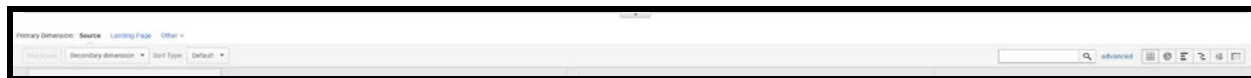
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3. Click on Referrals



a.

4. Click on Landing Page



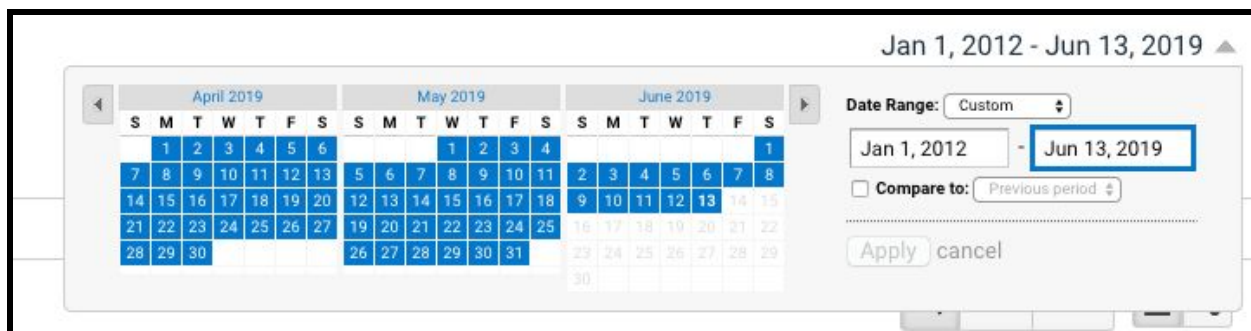
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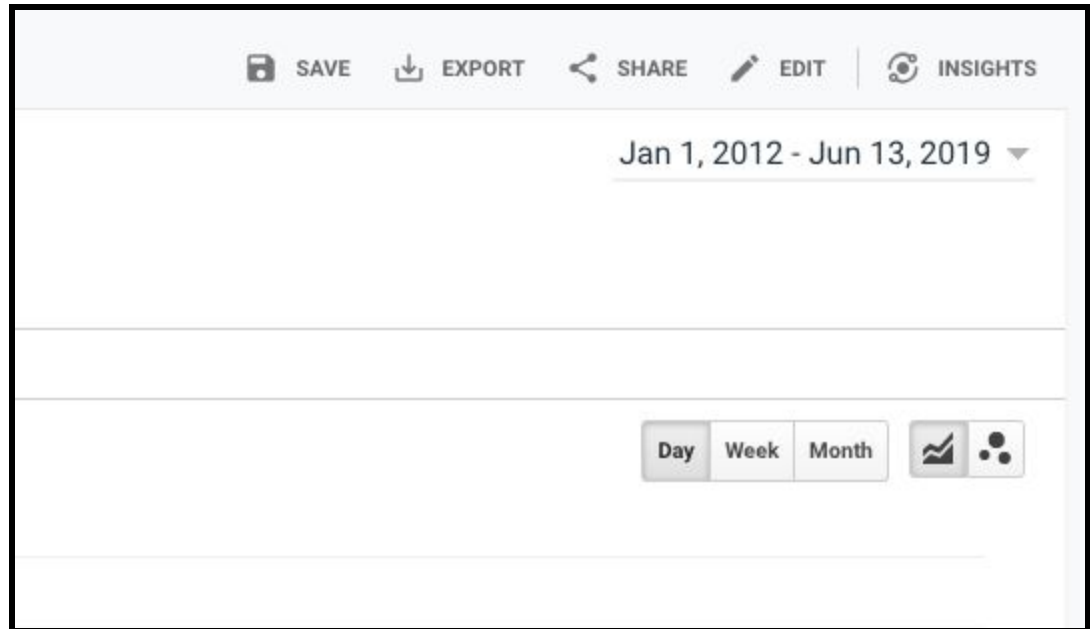
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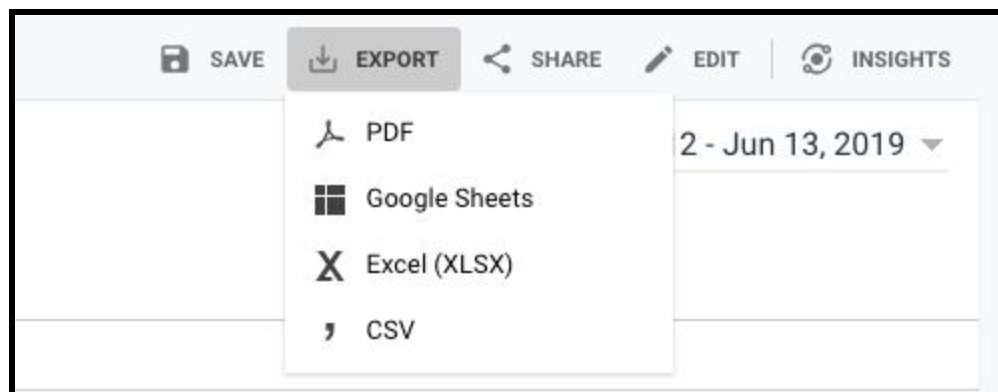
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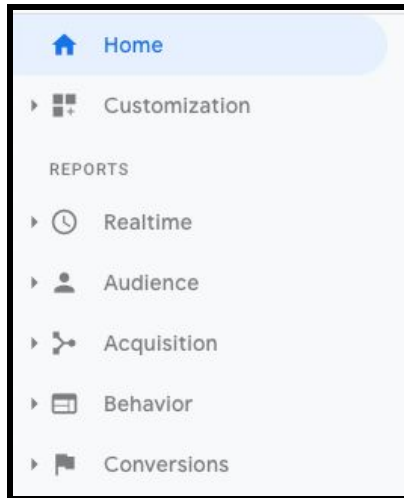
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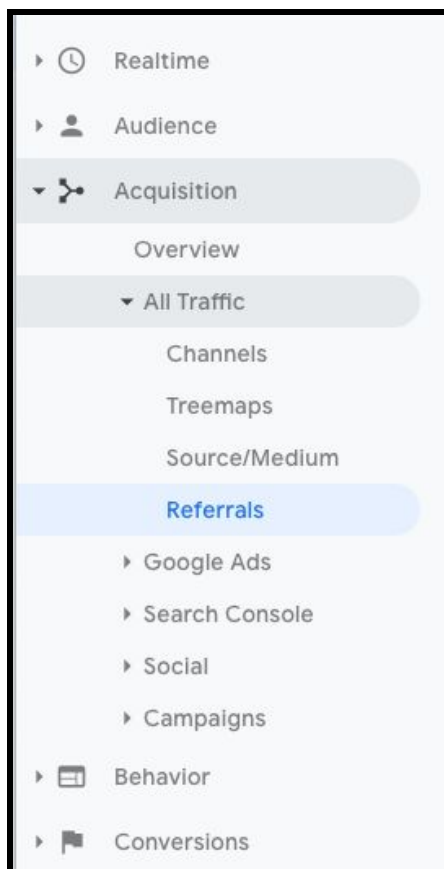
Acquisition, All Traffic, Channels (Default Channel Grouping)

1. Click on Acquisition



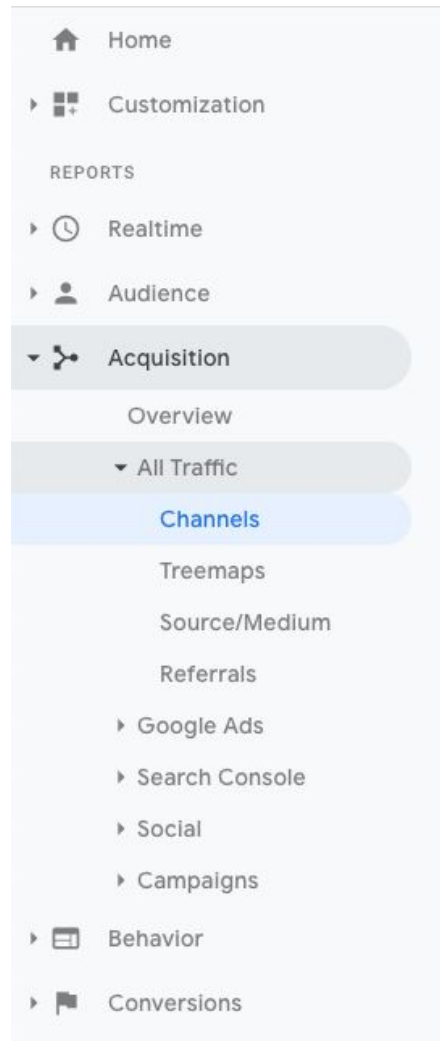
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2. Click on All Traffic



a.

3. Click on Channels



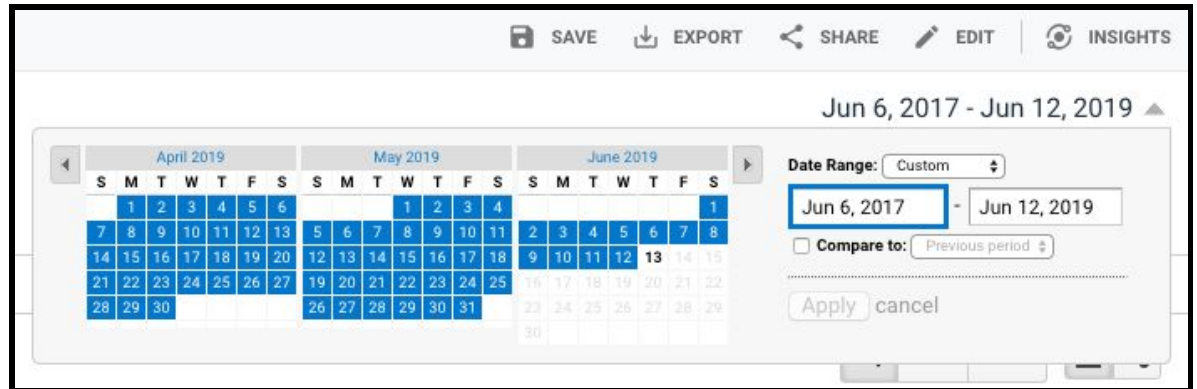
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4. Click on the Date Range



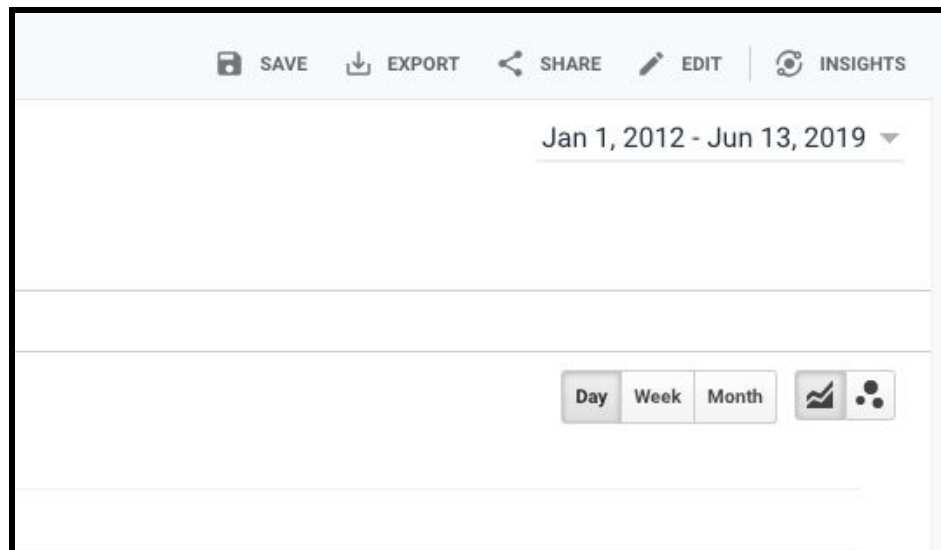
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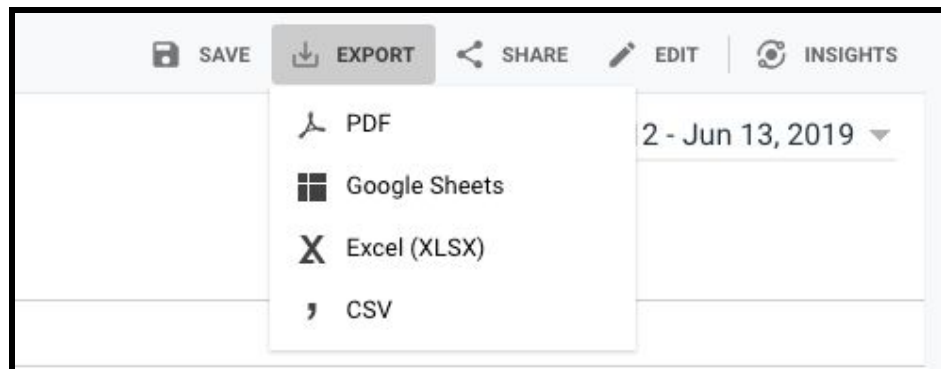
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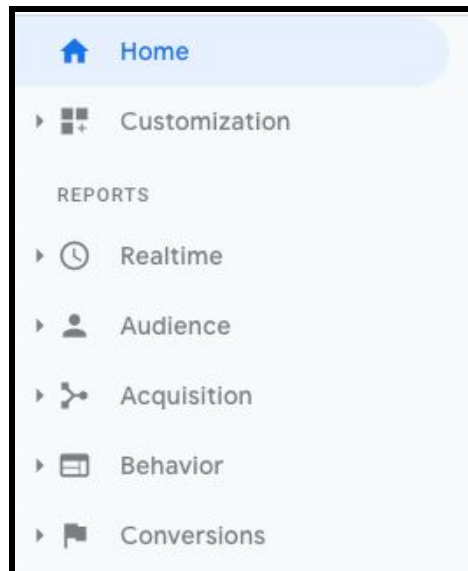
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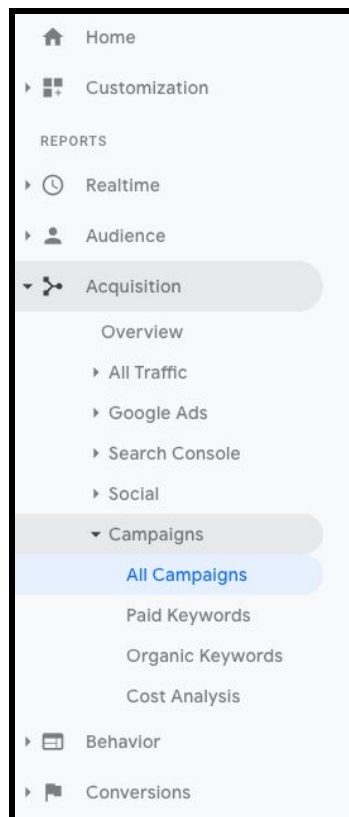
Acquisitions Google Ads, Campaigns (All Campaigns)

1. Click on Acquisitions



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2. Click on Campaigns



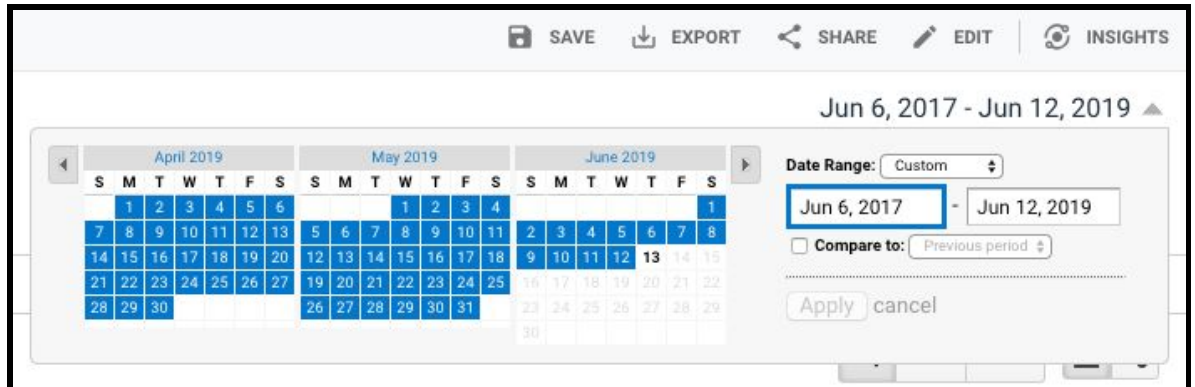
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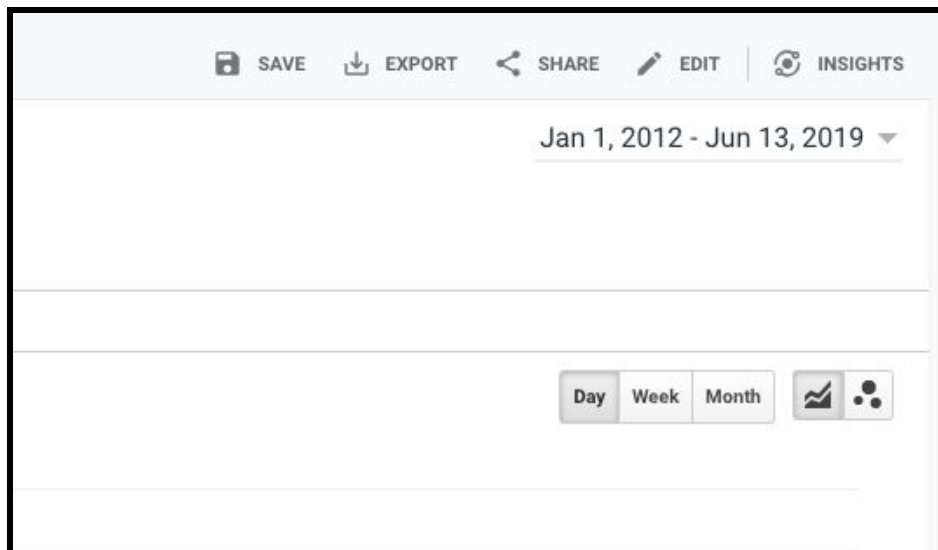
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4. Update Date Range to January 1, 2012 - December 31, 2019



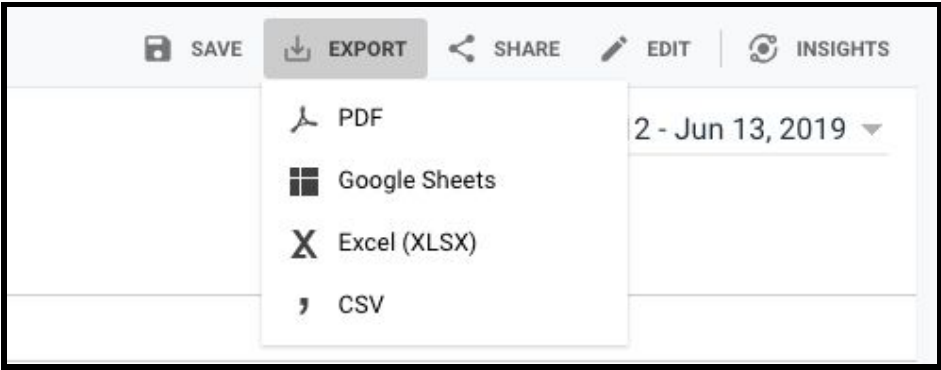
a.

5. Click on Export



a.

6. Click on Excel (XLSX)



a.

Acquisition, Social, Overview

1. Click on Acquisition
2. Click on Social
3. Click on the Overview
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on view full report located below the event category list on the bottom right
6. Click on show rows
7. Click on "5000"
8. Click on Export
9. Click on PDF
10. Click on Export
11. Click on Excel (XLSX)

Acquisition, Social, Conversions

1. Click on Acquisition
2. Click on Conversions
3. Click on the Overview
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on show rows
6. Click on "5000"
7. Click on Export
8. Click on PDF

Acquisition, Social, Conversions (Assisted vs. Last Interaction Analysis)

1. Click on Acquisition
2. Click on Conversions
3. Click on the Overview
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on show rows
6. Click on "5000"
7. Click on Assisted vs. Last Interaction Analysis located above the line graph and next to the Explorer tab.
8. Click on Export
9. Click on PDF

Acquisition, Social, Conversions (Secondary Dimension Ad Content)

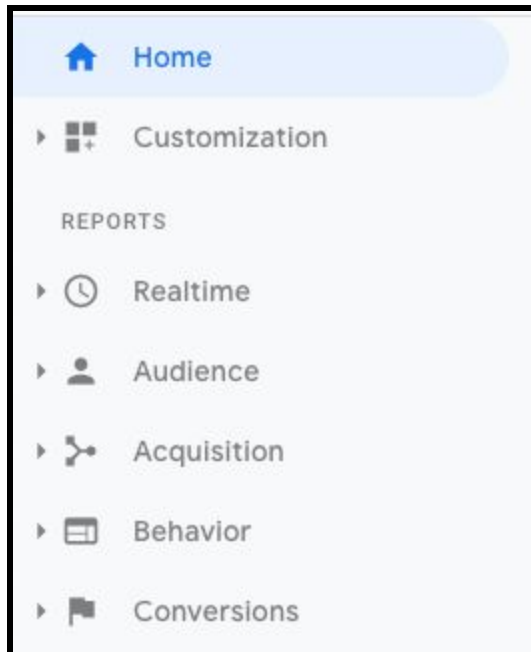
1. Click on Acquisition
2. Click on Conversions
3. Click on the Overview
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
6. Click Google Ads and then select Ad Content from the drop down menu.
7. Click on show rows
8. Click on "5000"
9. Click on Assisted vs. Last Interaction Analysis located above the line graph and next to the Explorer tab.
10. Click on Export
11. Click on PDF

Acquisition, Social, Conversions (Secondary Dimension Ad Content Path)

1. Click on Acquisition
2. Click on Conversions
3. Click on the Overview
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
6. Click Google Ads and then select Ad Content Path from the drop down menu.
7. Click on show row
8. Click on "5000"
9. Click on Assisted vs. Last Interaction Analysis located above the line graph and next to the Explorer tab.
10. Click on Export
11. Click on PDF

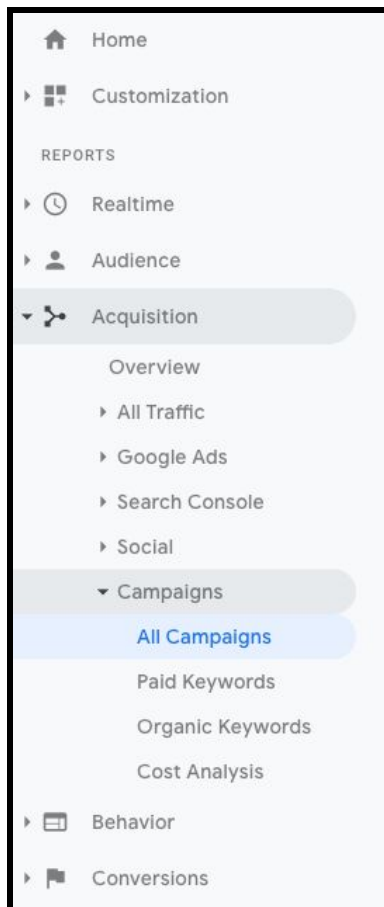
Acquisition Campaigns (Paid Keywords)

1. Click on Acquisitions



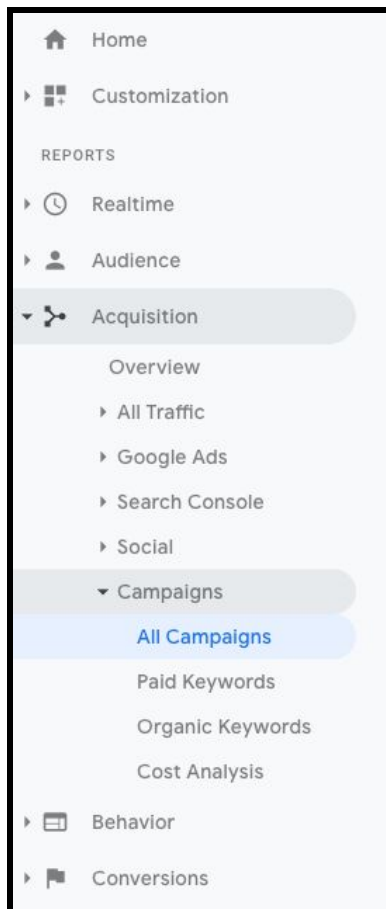
a.

2. Click on Campaigns



a.

3. Click on Paid Keywords



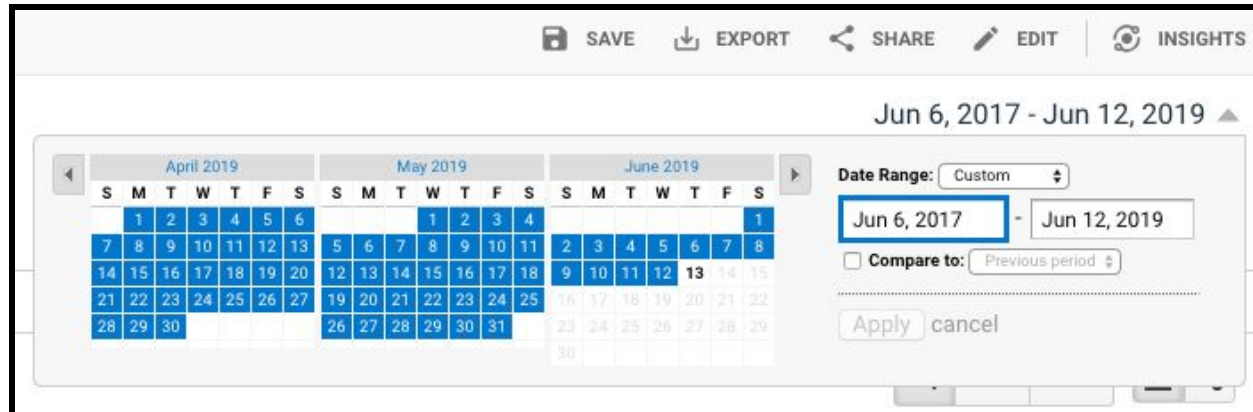
a.

4. Click on the Date Range



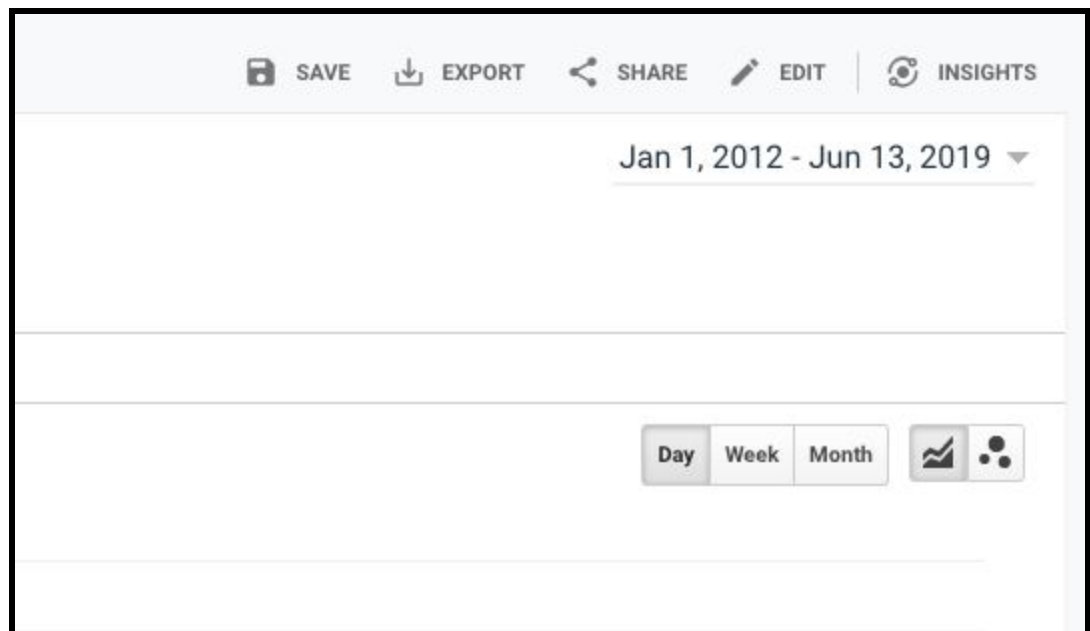
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



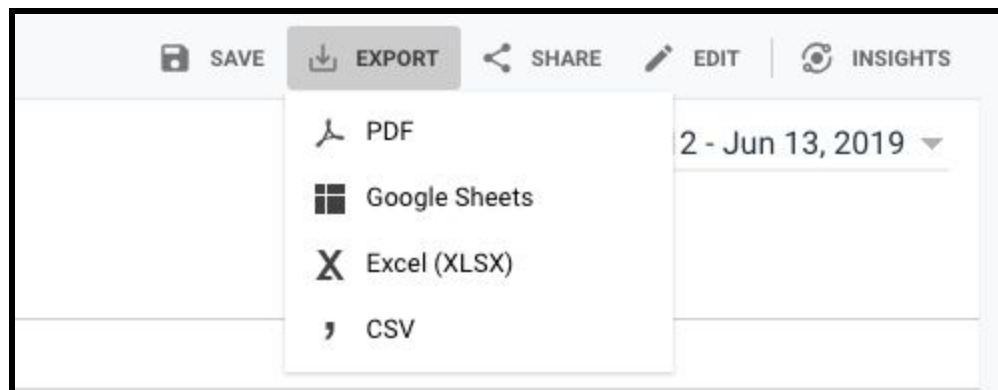
a.

6. Click on Export



a.

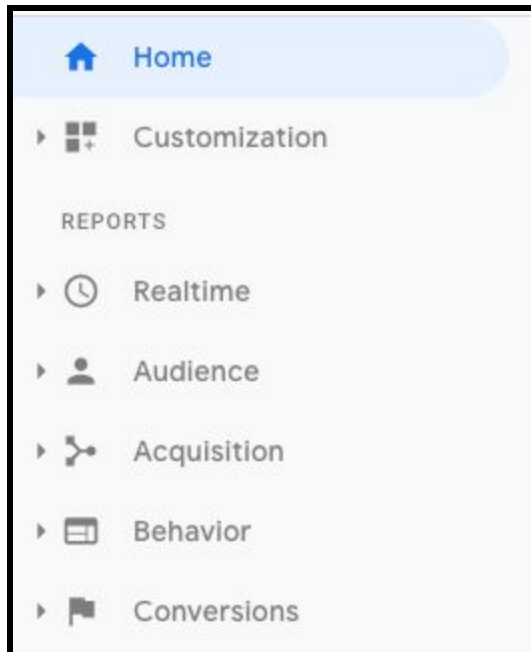
7. Click on Excel (XLSX)



a.

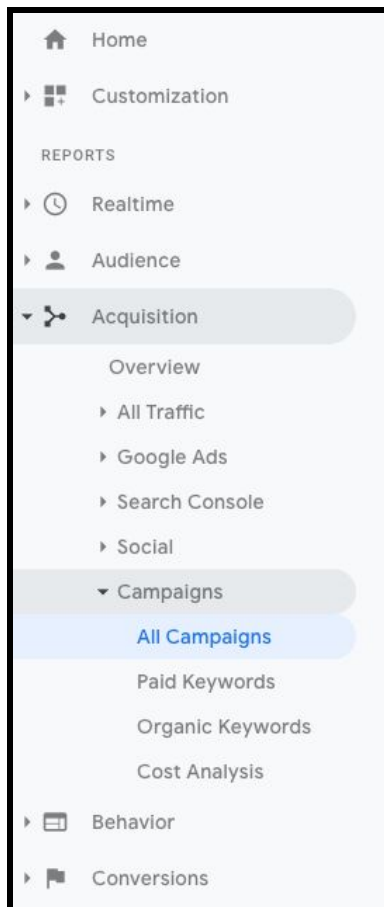
Acquisition Campaigns (Organic Keywords)

1. Click on Acquisitions



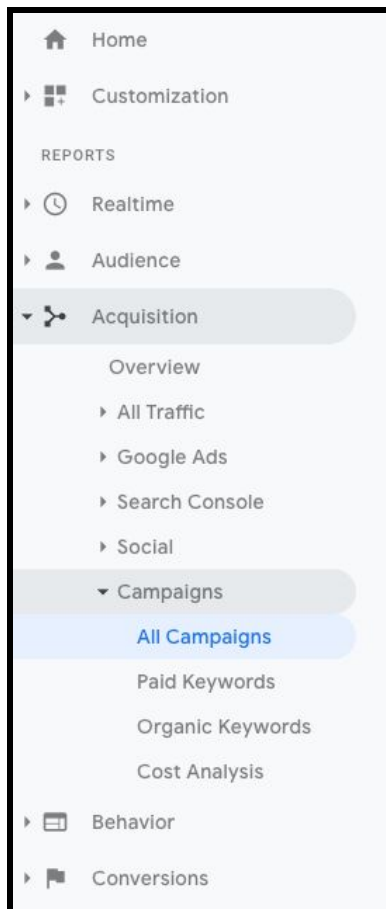
a.

2. Click on Campaigns



a.

3. Click on Organic Keywords



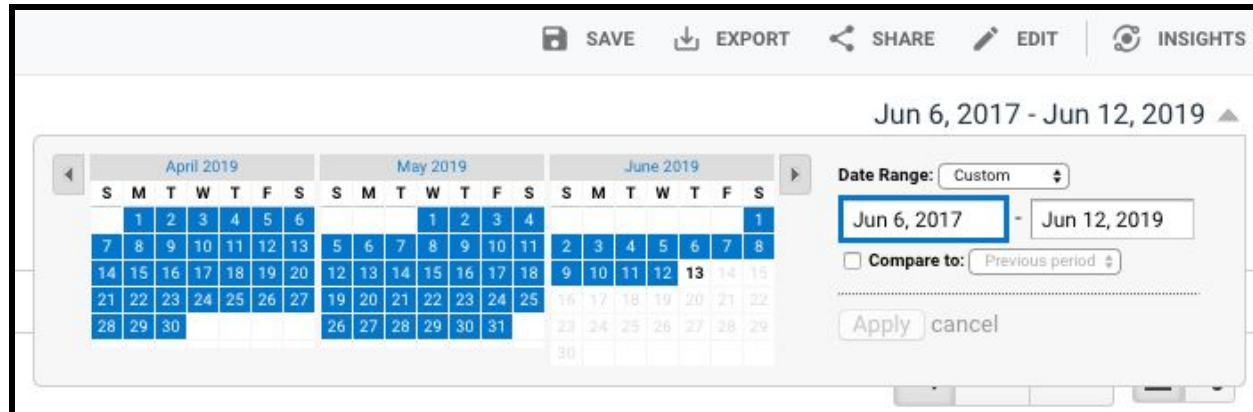
a.

4. Click on the Date Range



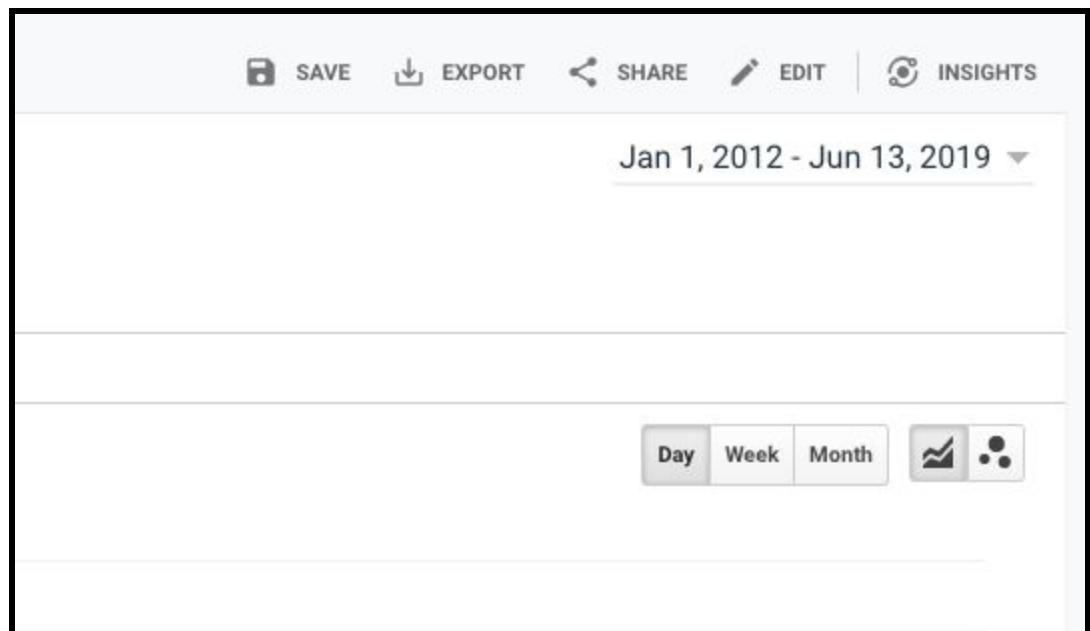
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



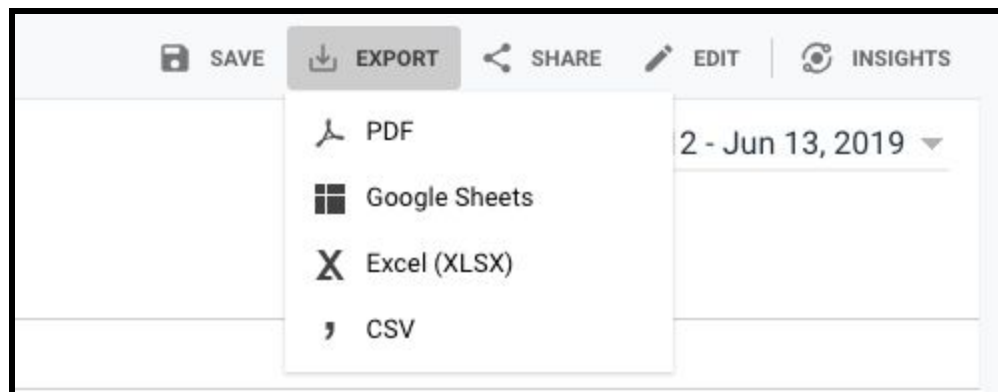
a.

6. Click on Export



a.

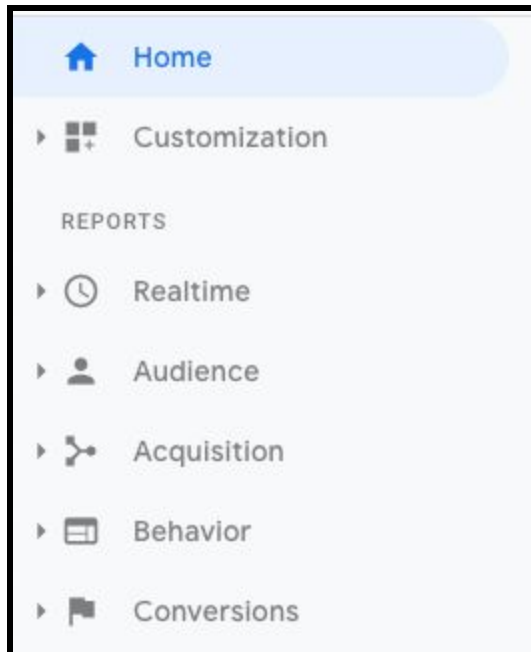
7. Click on Excel (XLSX)



a.

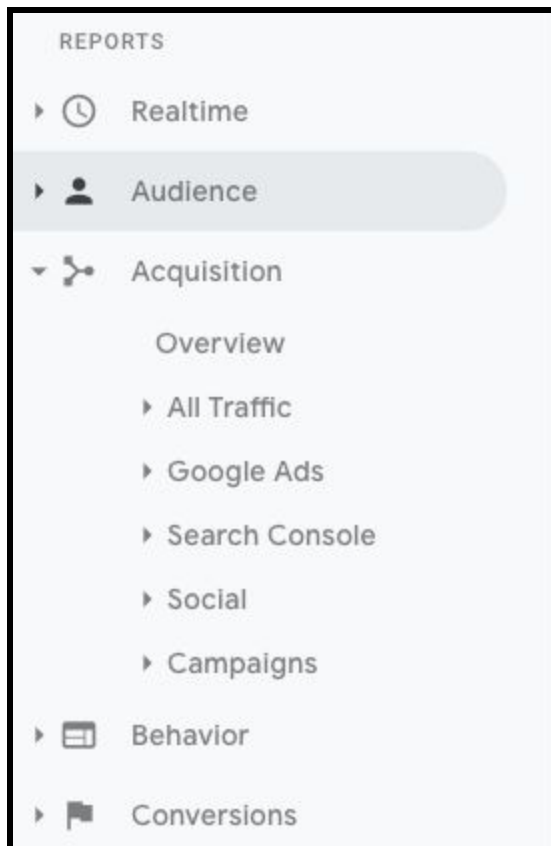
Acquisition Google Ads, Campaigns

1. Click on Acquisitions



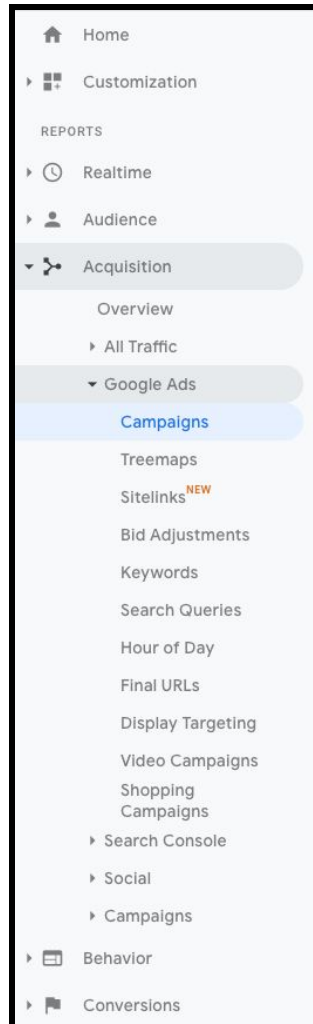
a.

2. Click on Google Ads



a.

3. Click on Campaigns



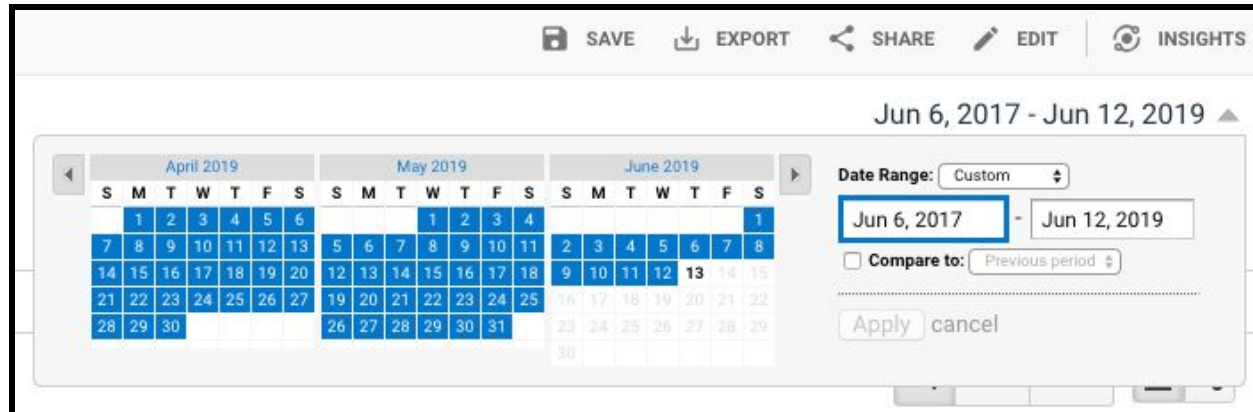
a.

4. Click on the Date Range



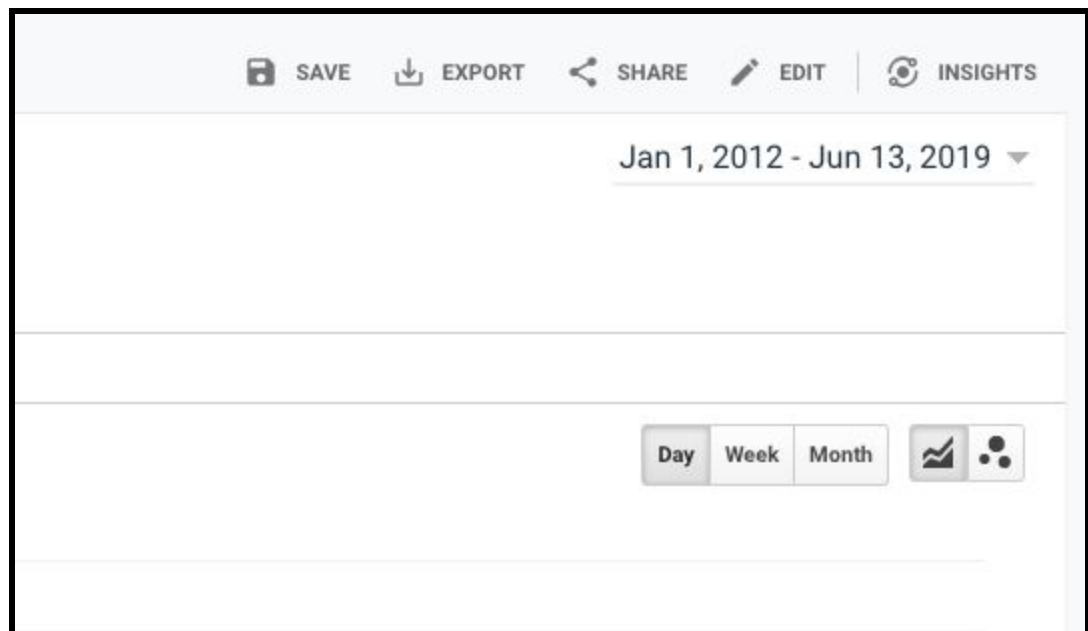
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



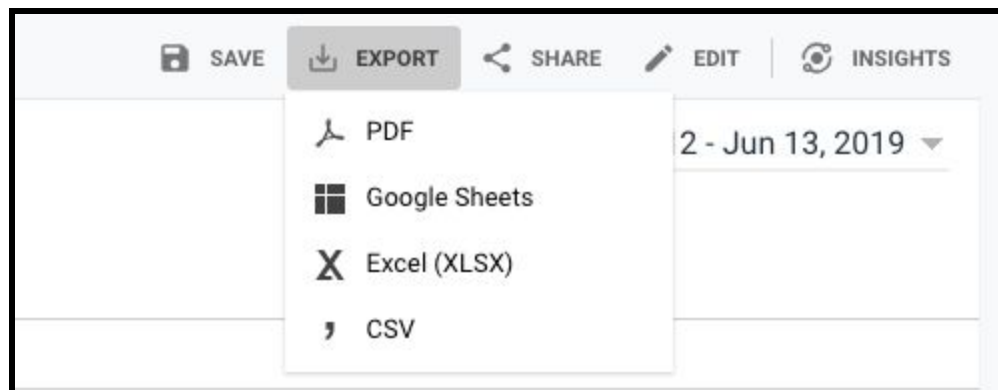
a.

6. Click on Export



a.

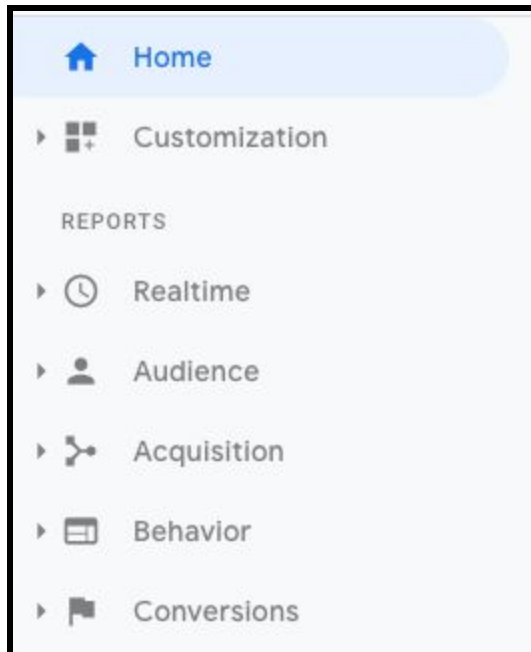
7. Click on Excel (XLSX)



a.

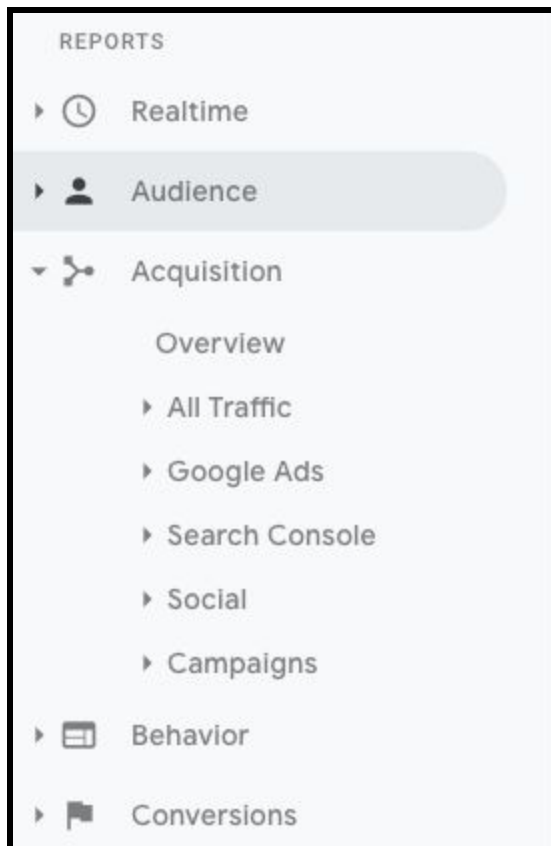
Acquisition Google Ads, Campaigns (Google Ads: Ad Group)

1. Click on Acquisitions



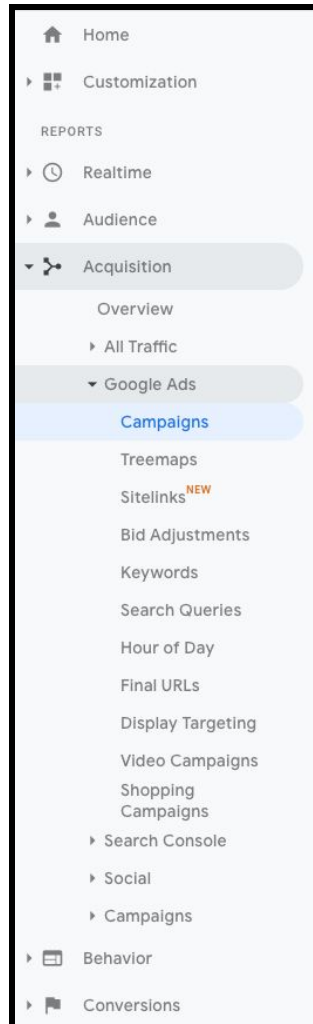
a.

2. Click on Google Ads



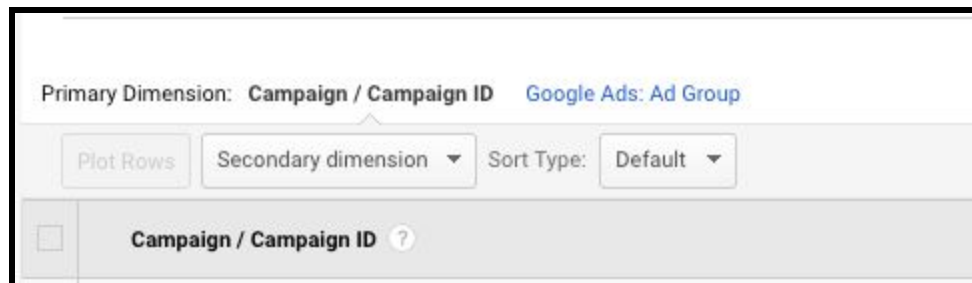
a.

3. Click on Campaigns



a.

4. Click on Google Ads: Ad Group



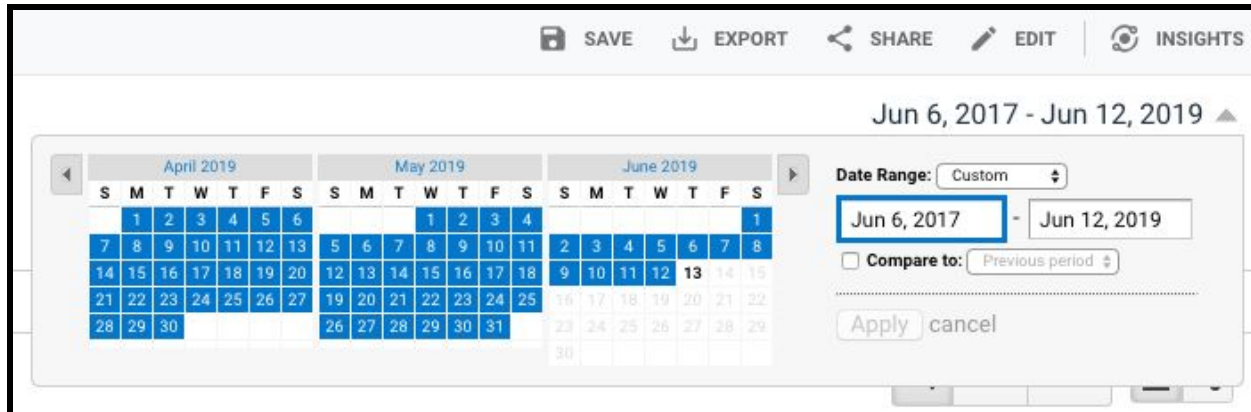
a.

5. Click on the Date Range



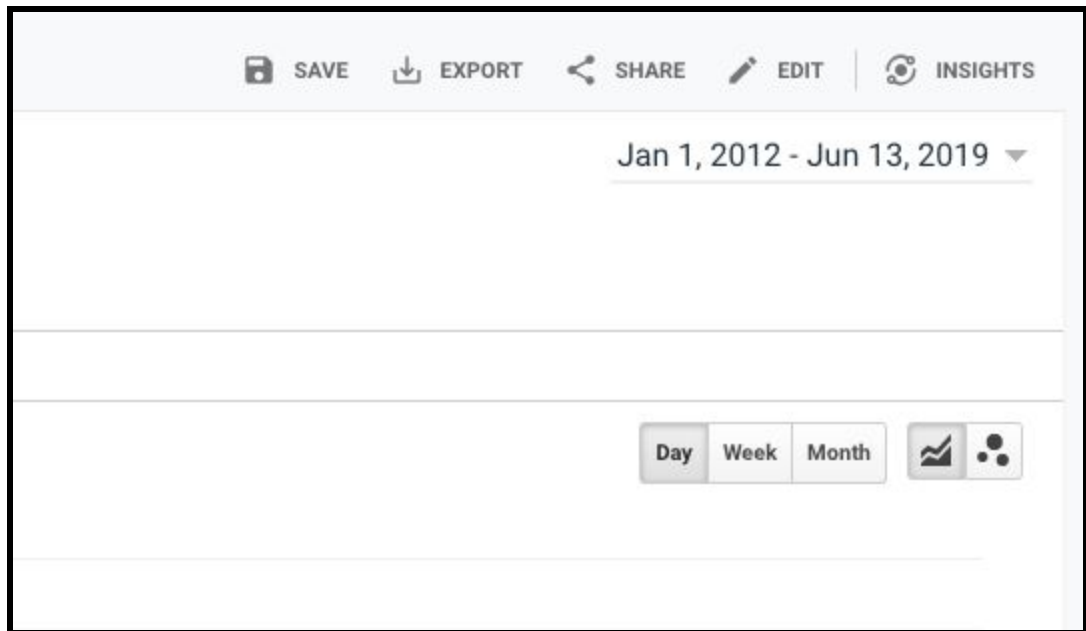
a.

6. Update Date Range to January 1, 2012 - December 31, 2019



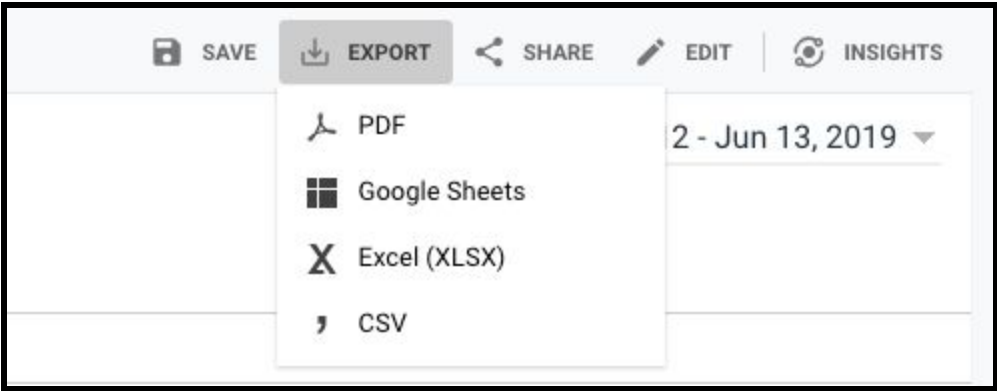
a.

7. Click on Export



a.

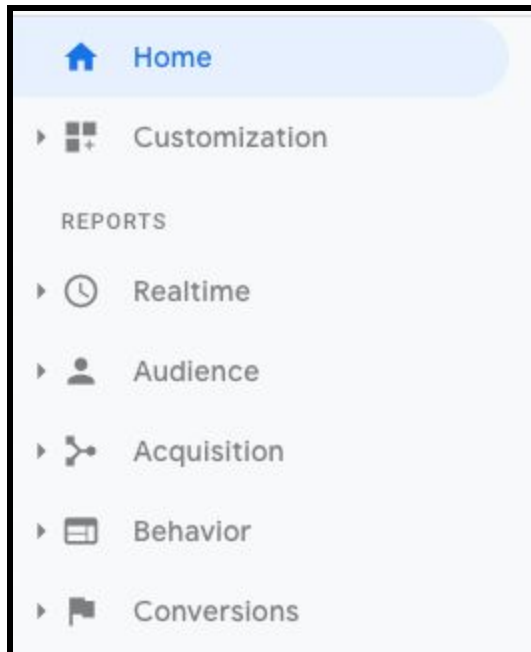
8. Click on Excel (XLSX)



a.

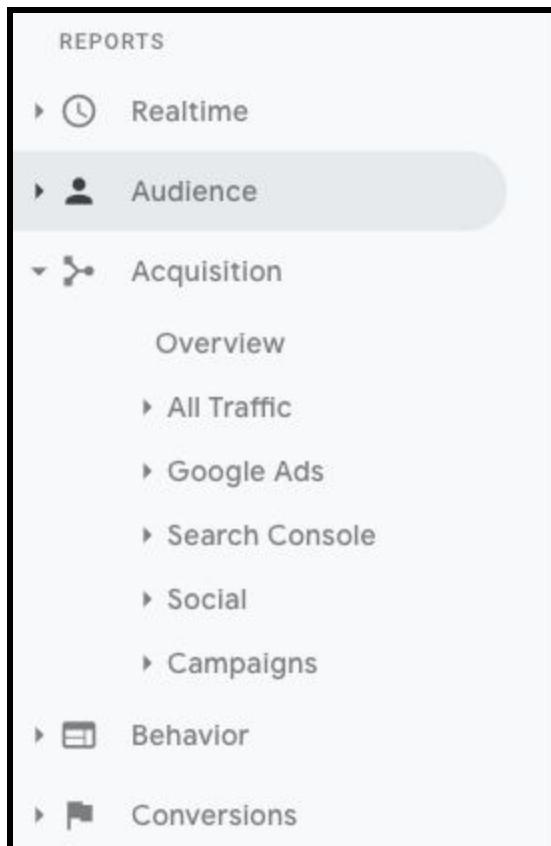
Acquisition Google Ads, Sitelinks

1. Click on Acquisitions



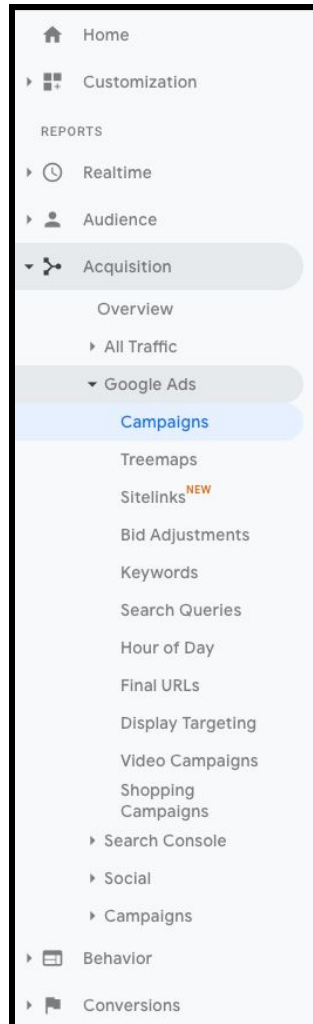
a.

2. Click on Google Ads



a.

3. Click on Sitelinks



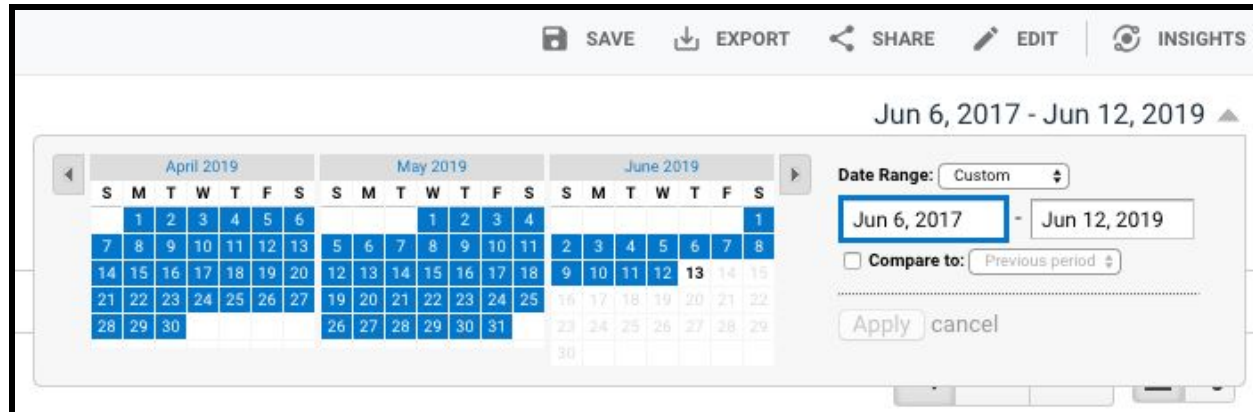
a.

4. Click on the Date Range



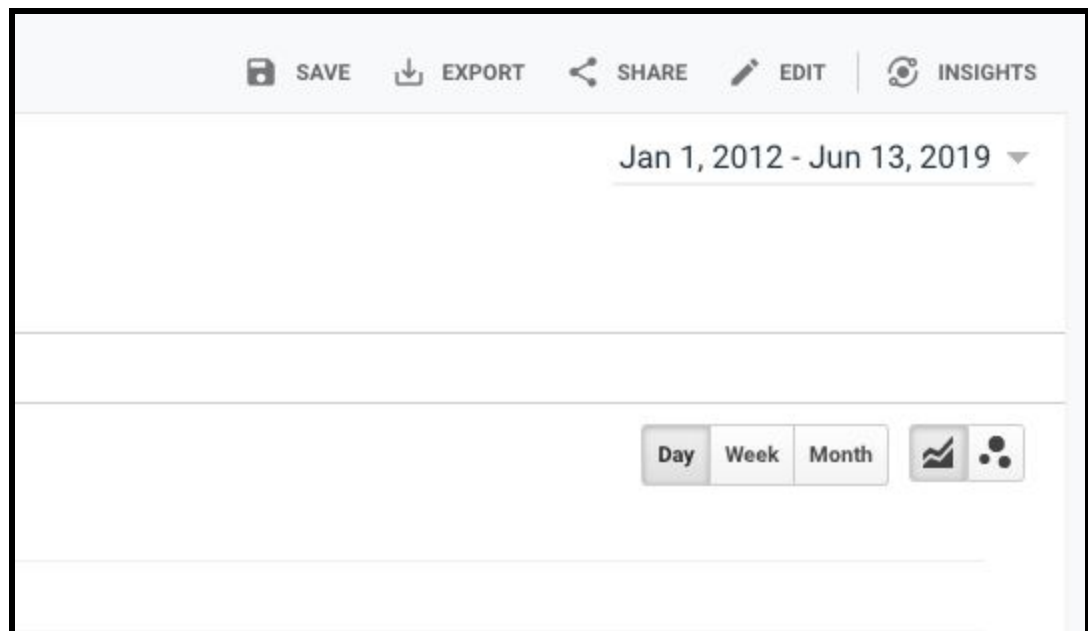
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



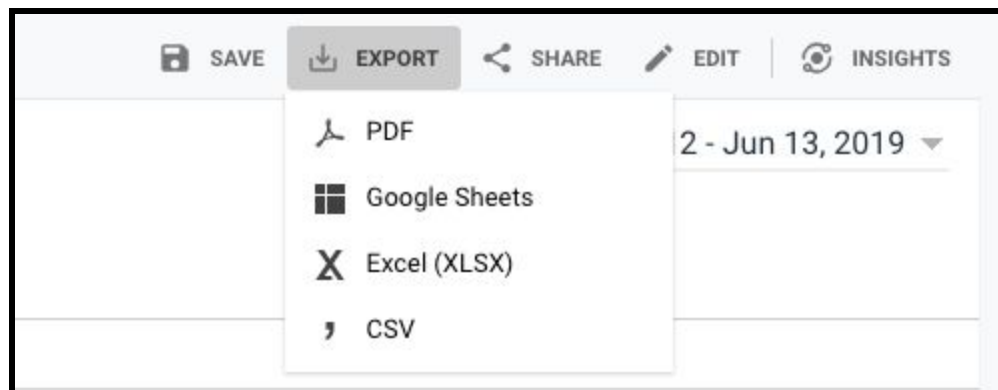
a.

6. Click on Export



a.

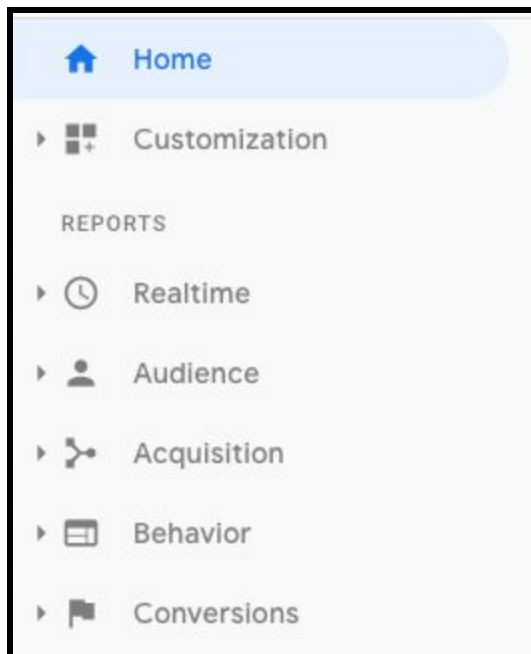
7. Click on Excel (XLSX)



a.

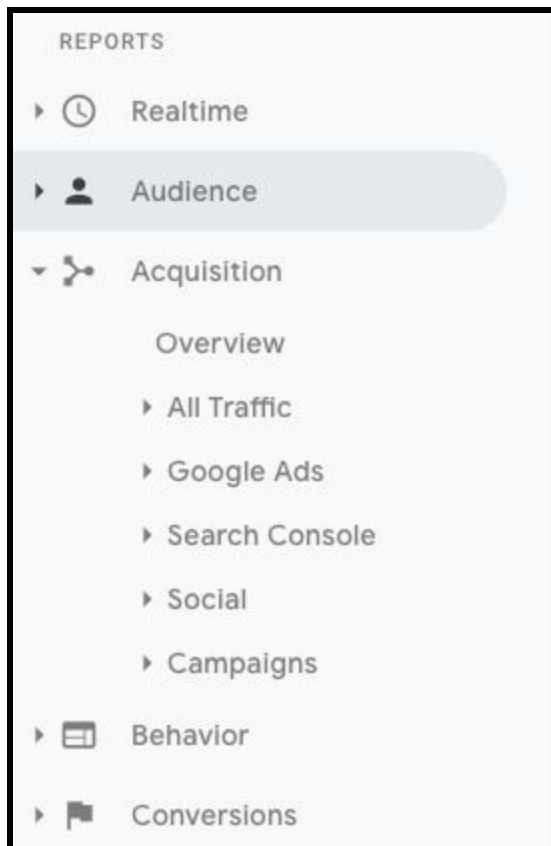
Acquisition Google Ads, Bid Adjustments

1. Click on Acquisitions



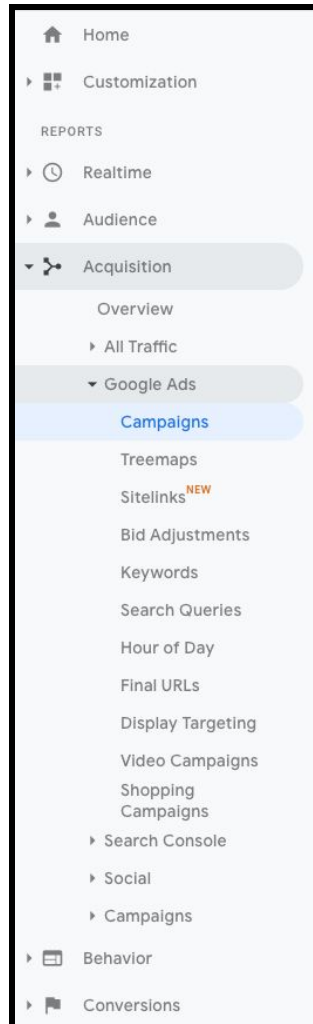
a.

2. Click on Google Ads



a.

3. Click on Bid Adjustments



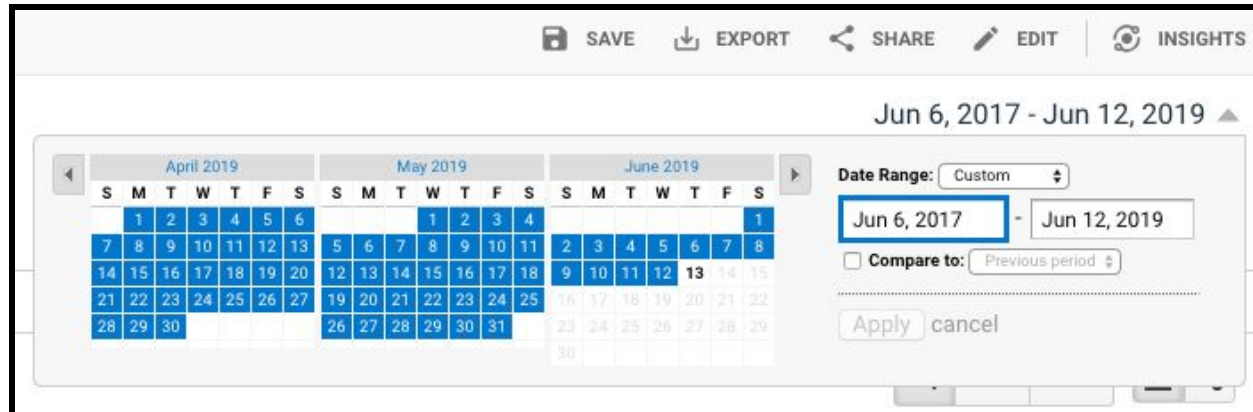
a.

4. Click on the Date Range



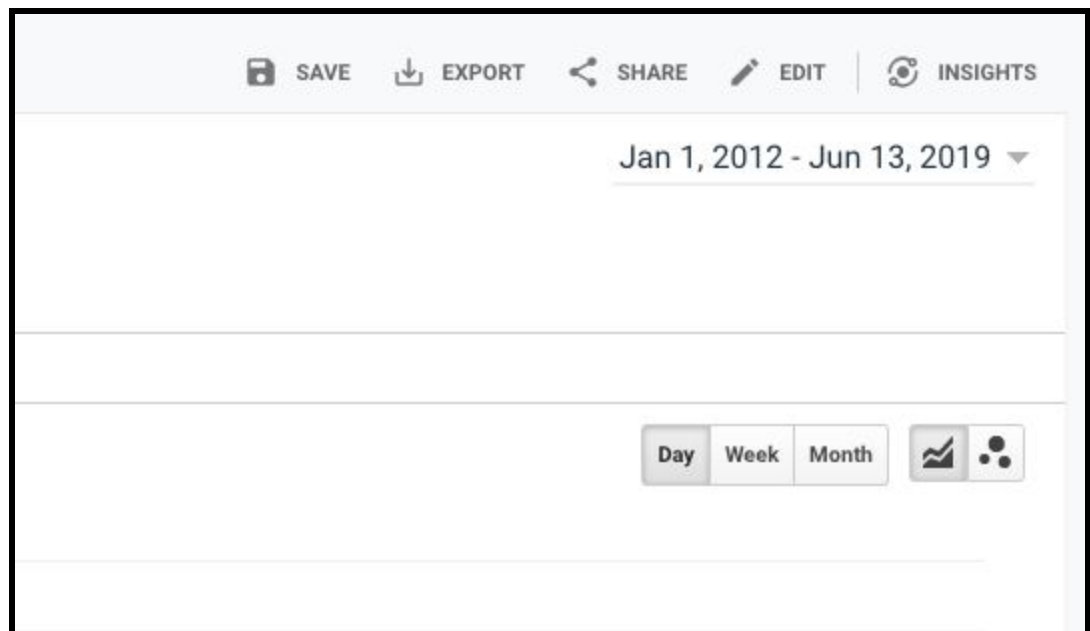
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



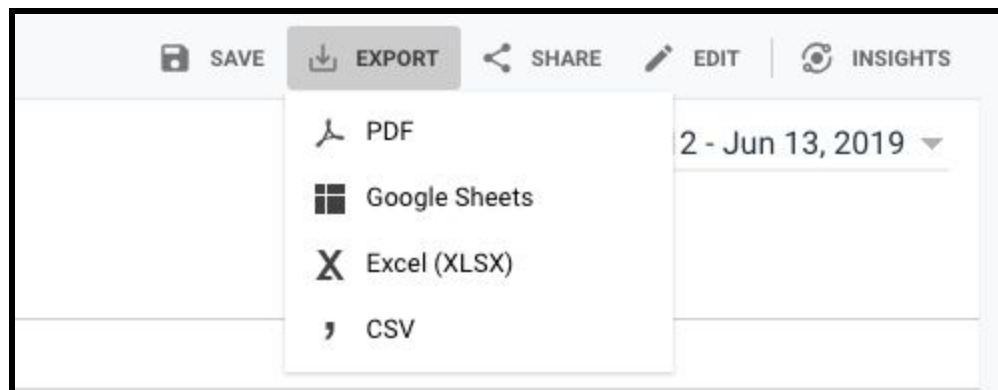
a.

6. Click on Export



a.

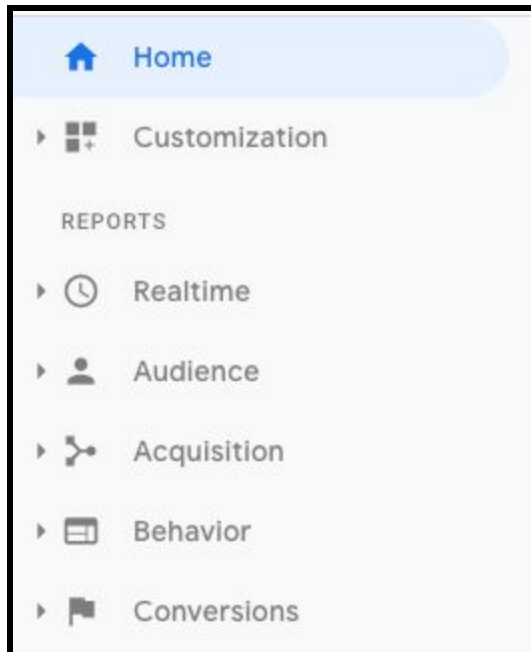
7. Click on Excel (XLSX)



a.

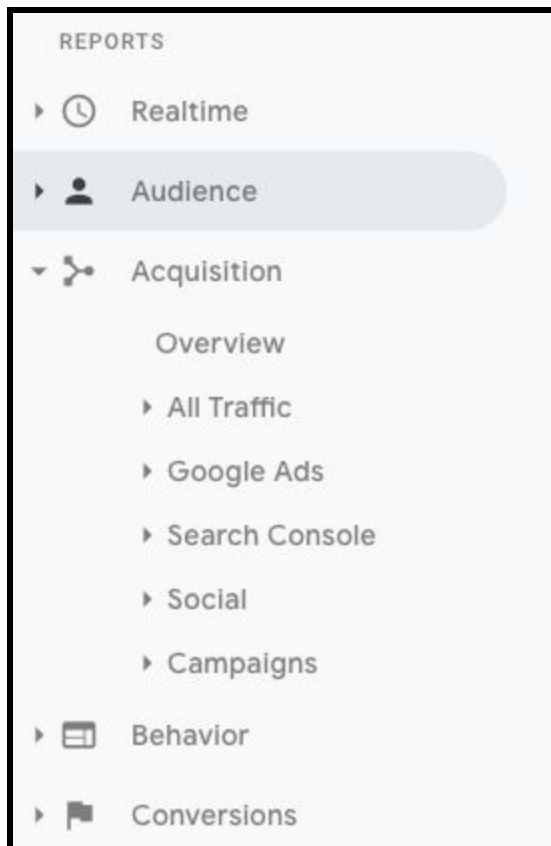
Acquisition Google Ads, Keywords

1. Click on Acquisitions



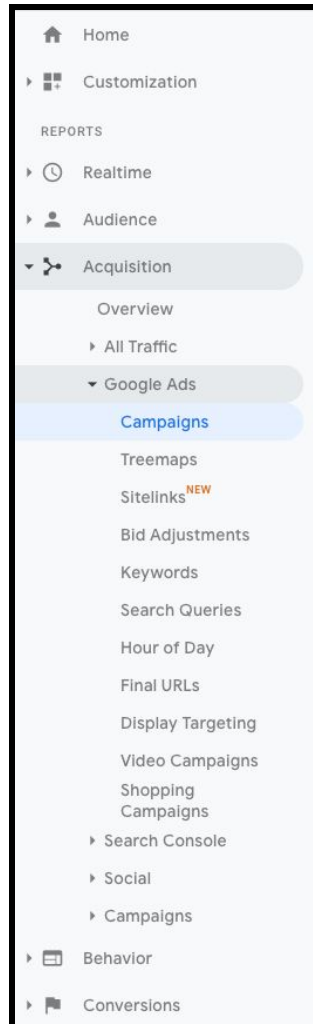
a.

2. Click on Google Ads



a.

3. Click on Keywords



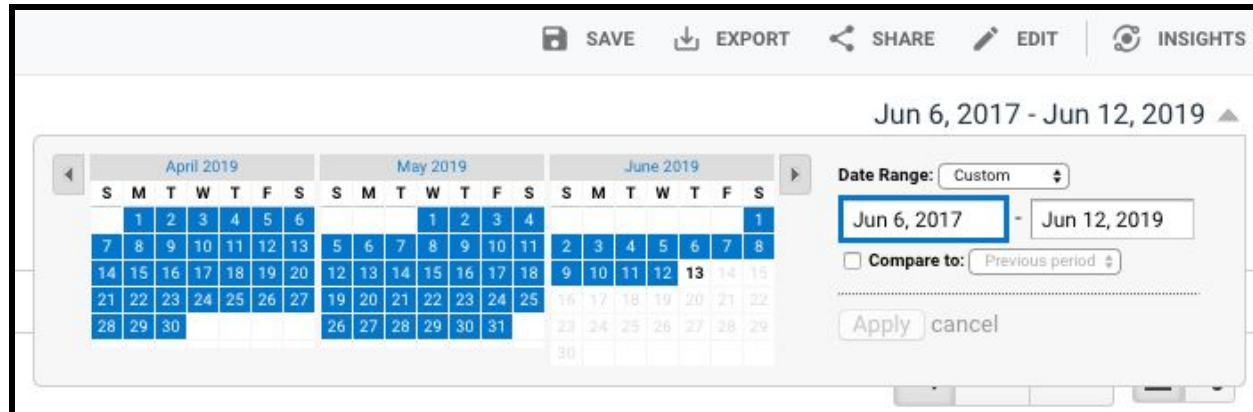
a.

4. Click on the Date Range



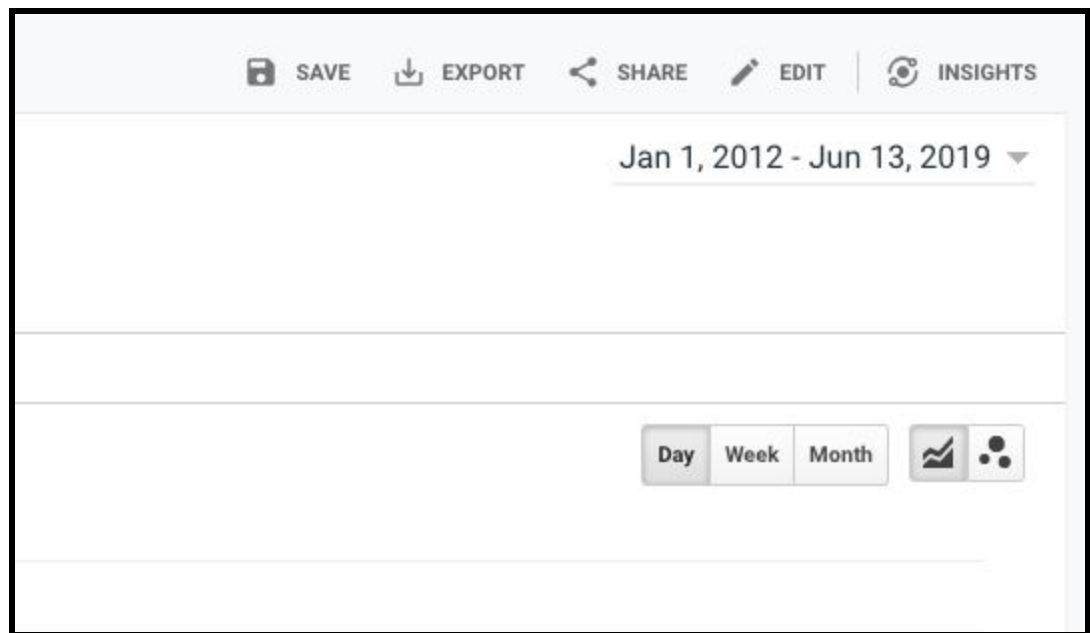
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



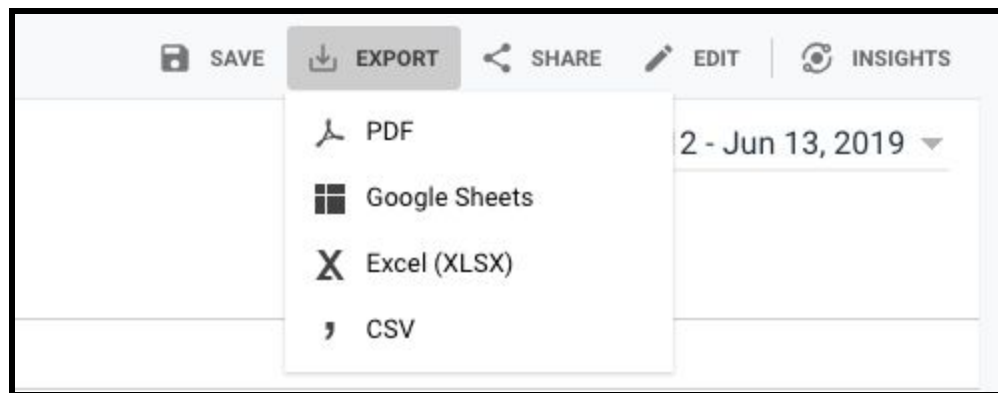
a.

6. Click on Export



a.

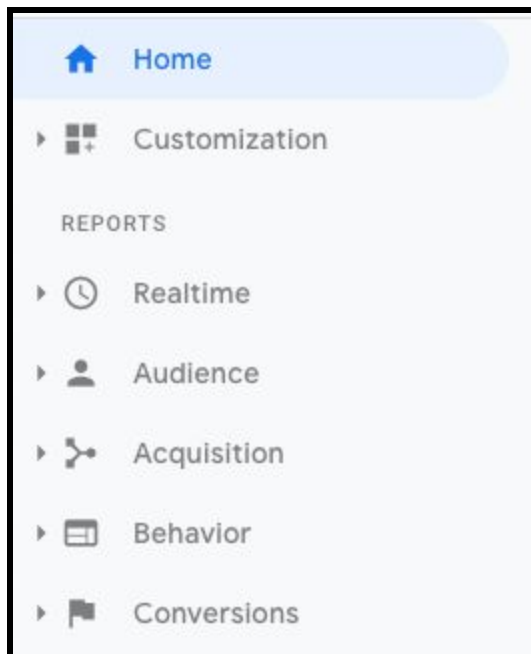
7. Click on Excel (XLSX)



a.

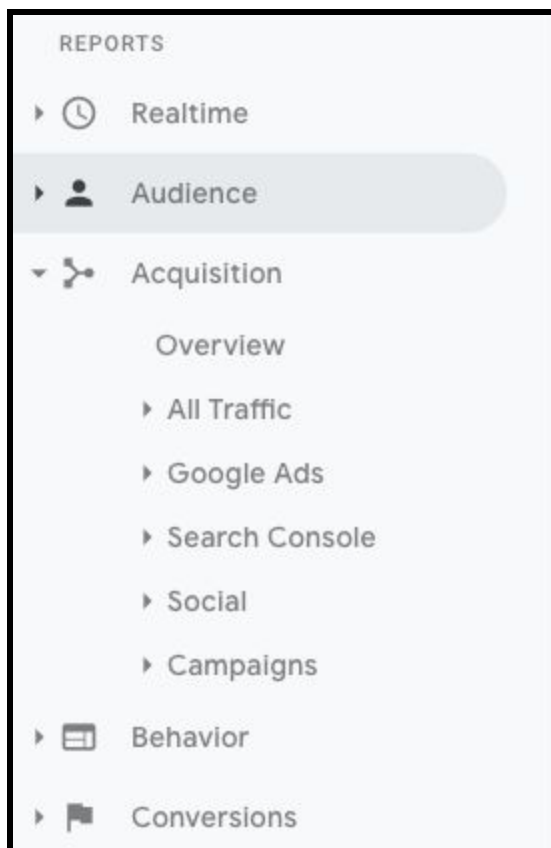
Google Ads, Keywords (ad Content)

1. Click on Acquisitions



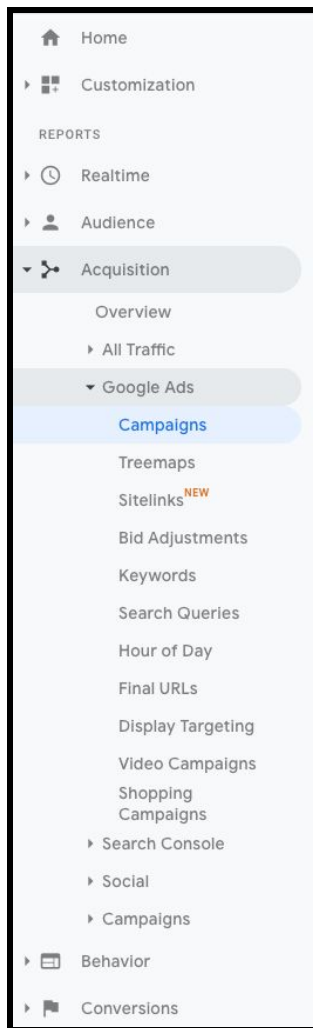
a.

2. Click on Google Ads



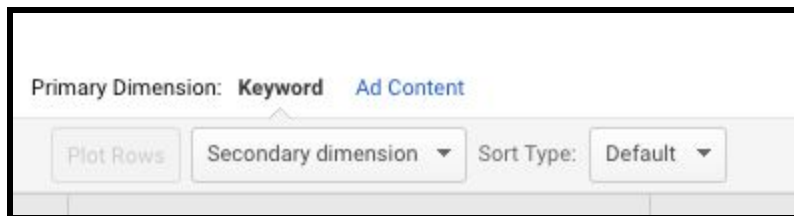
a.

3. Click on Keywords



a.

4. Click on Ad Content



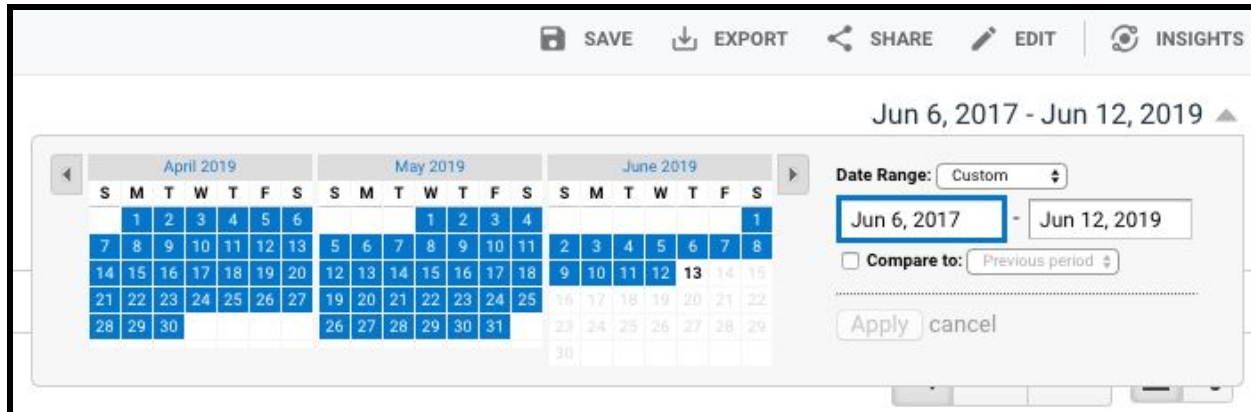
a.

5. Click on the Date Range



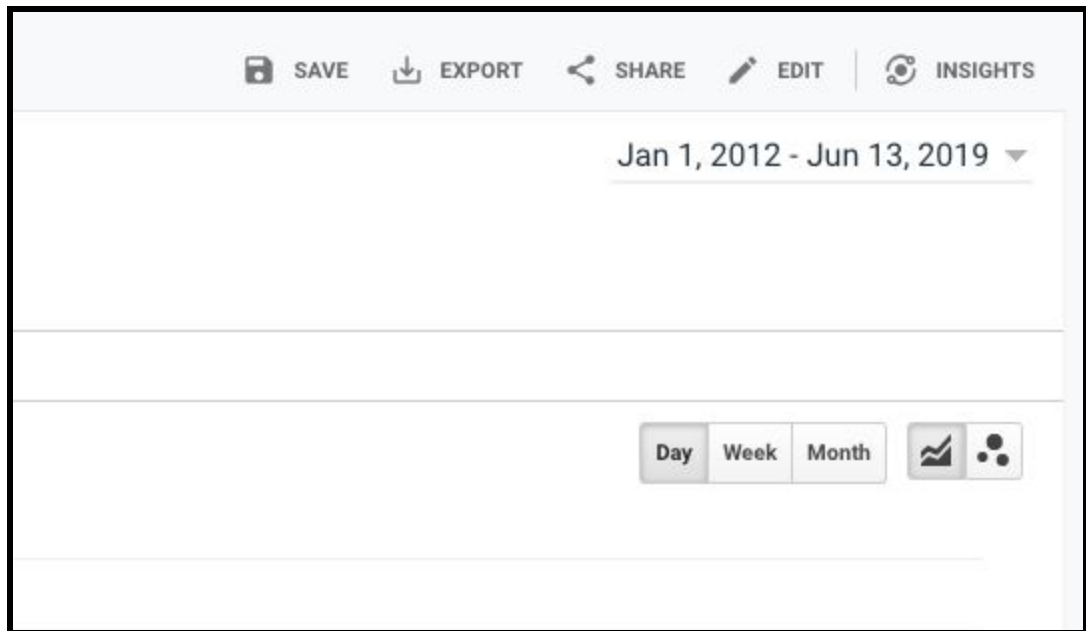
a.

6. Update Date Range to January 1, 2012 - December 31, 2019



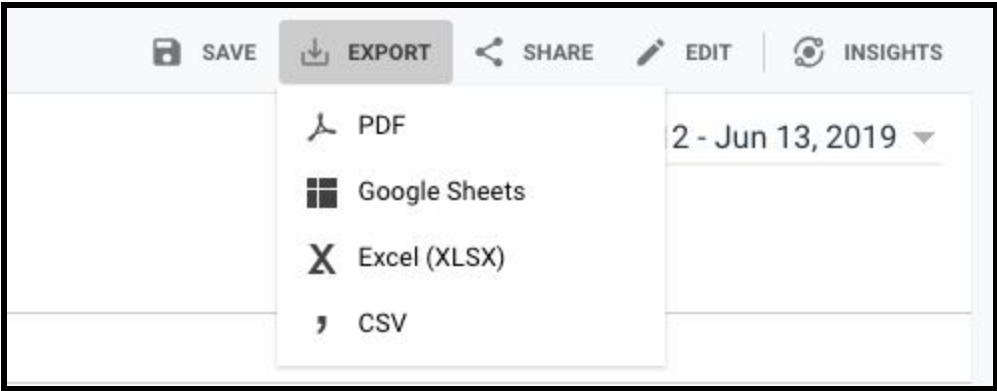
a.

7. Click on Export



a.

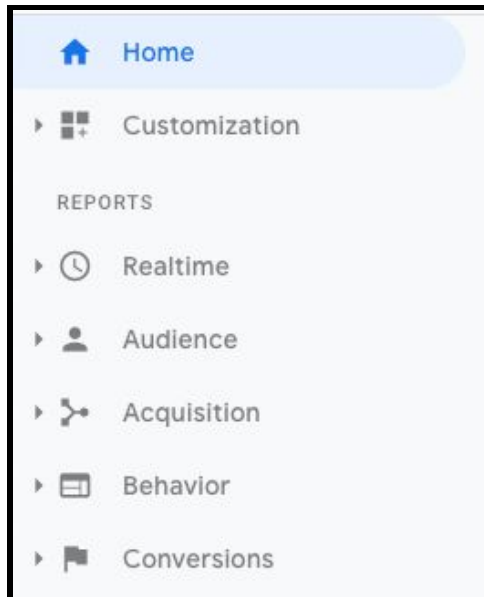
8. Click on Excel (XLSX)



a.

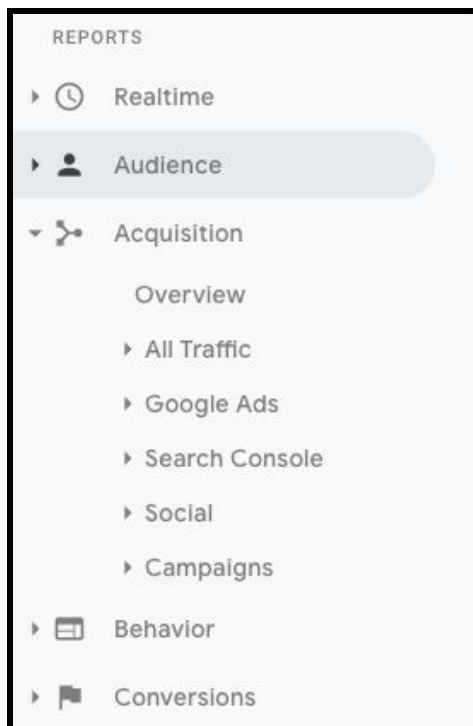
Acquisition Google Ads, Final URLs

1. Click on Acquisitions



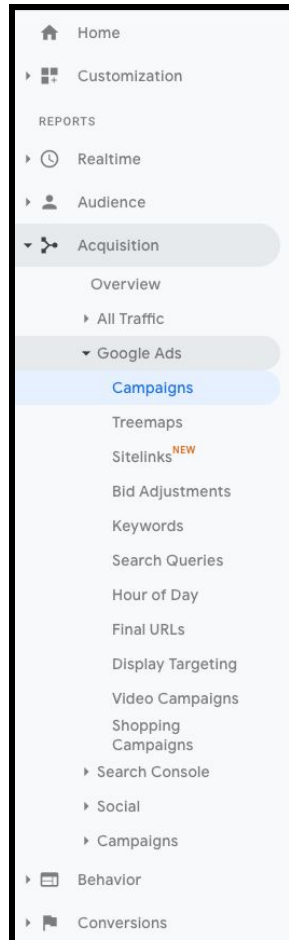
a.

2. Click on Google Ads



a.

3. Click on Final URLs



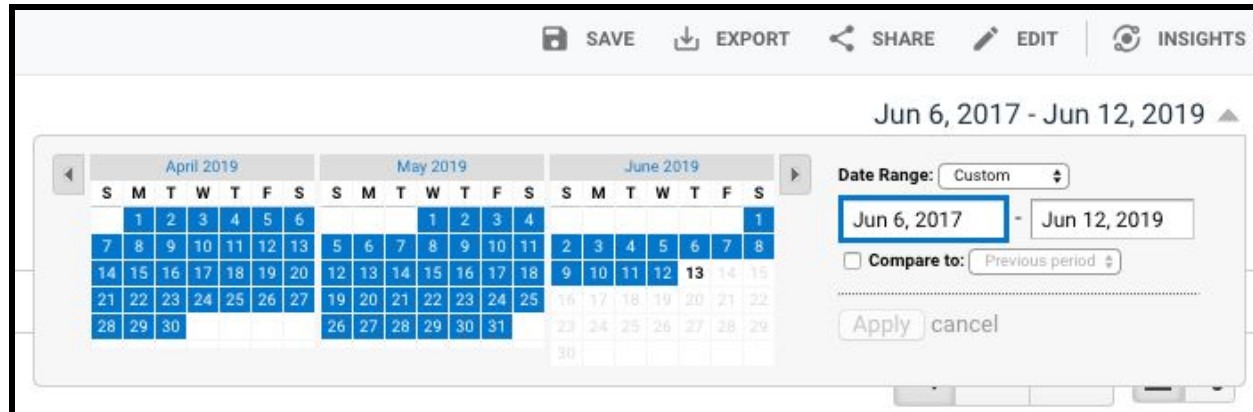
a.

4. Click on the Date Range



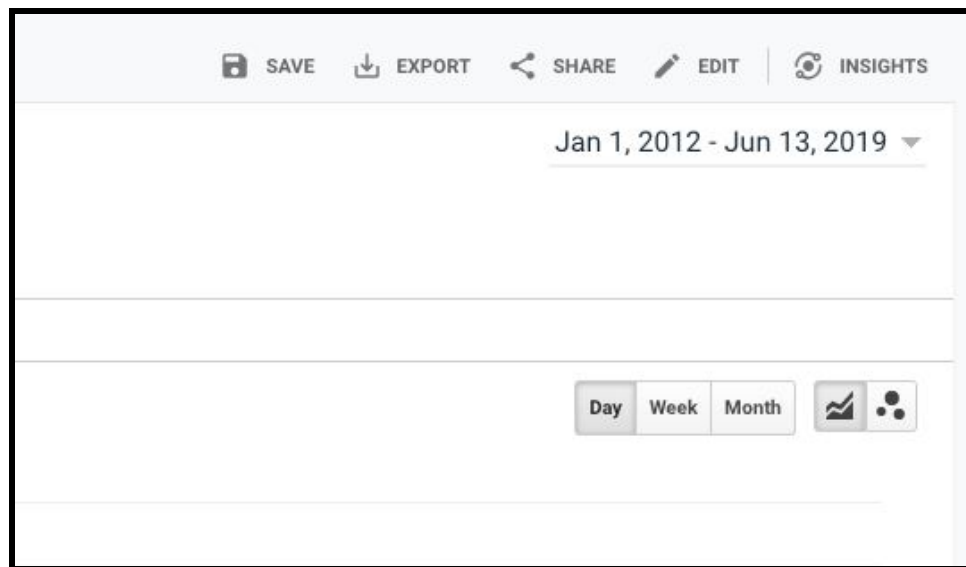
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



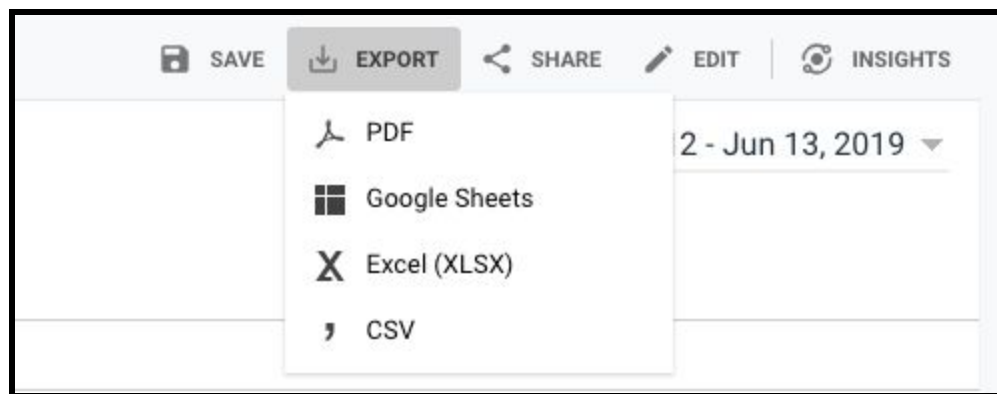
a.

6. Click on Export



a.

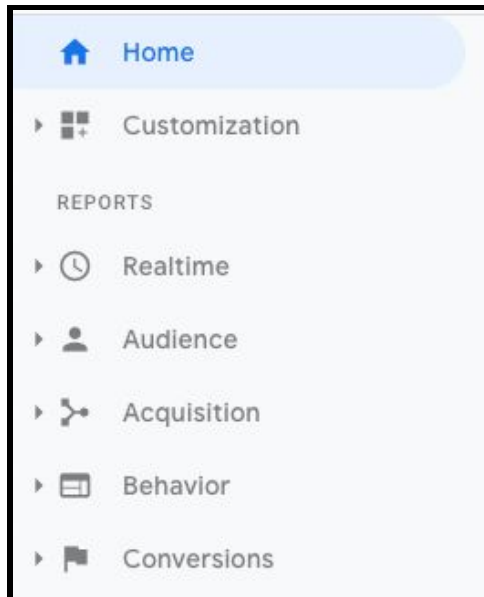
7. Click on Excel (XLSX)



a.

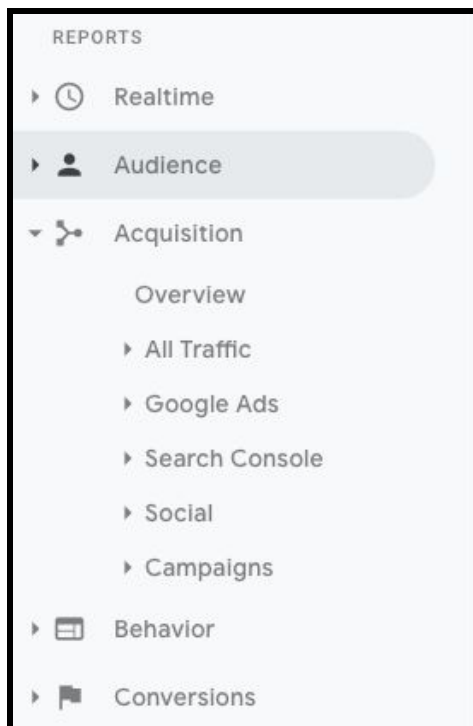
Acquisition Google Ads, Search Queries

1. Click on Acquisitions



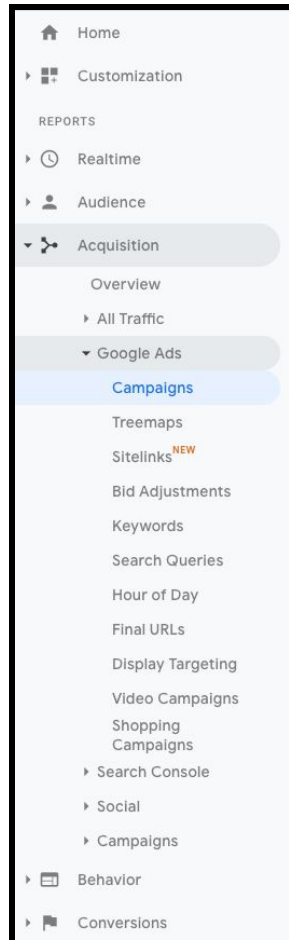
a.

2. Click on Google Ads



a.

3. Click on Search Queries



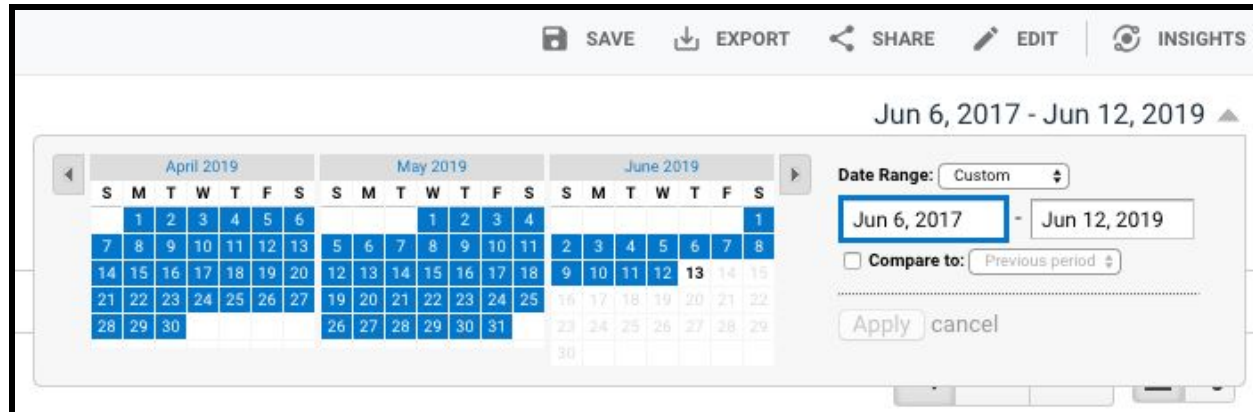
a.

4. Click on the Date Range



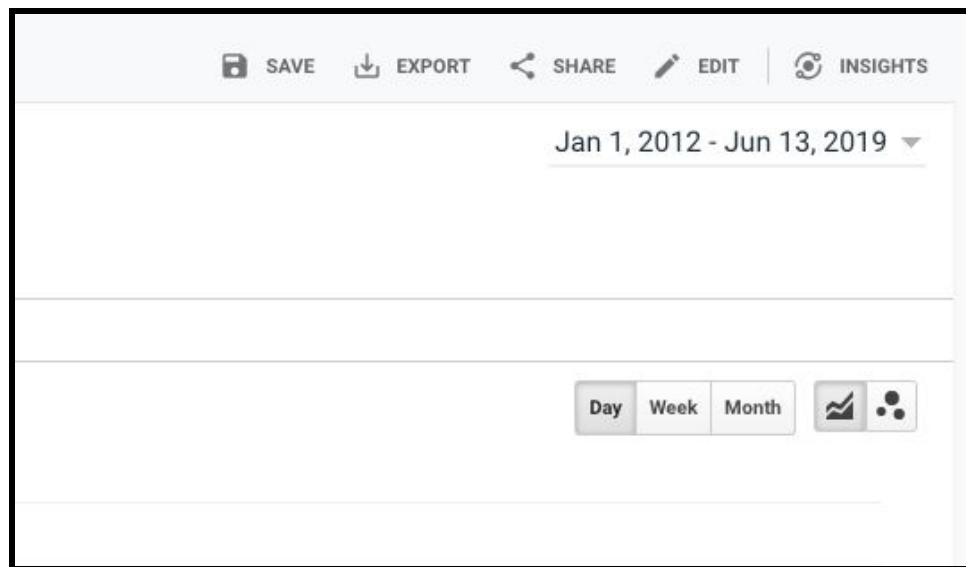
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



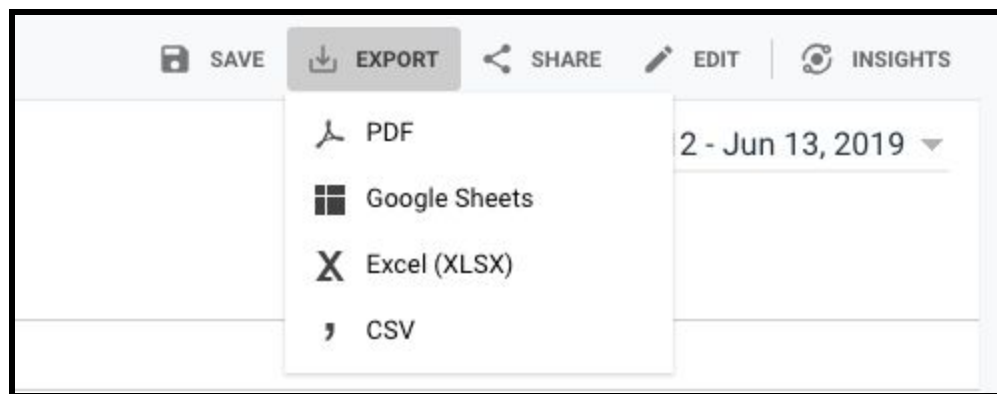
a.

6. Click on Export



a.

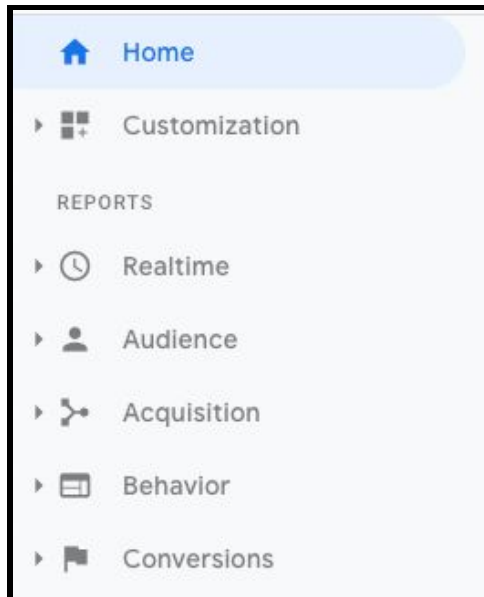
7. Click on Excel (XLSX)



a.

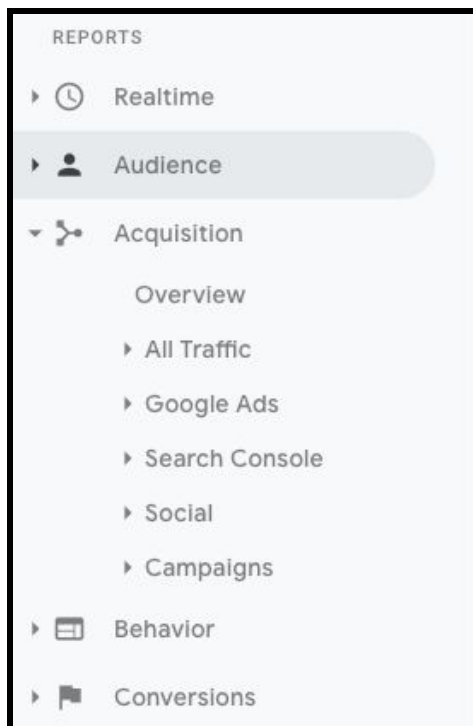
Acquisition Google Ads, Display Targeting

1. Click on Acquisitions



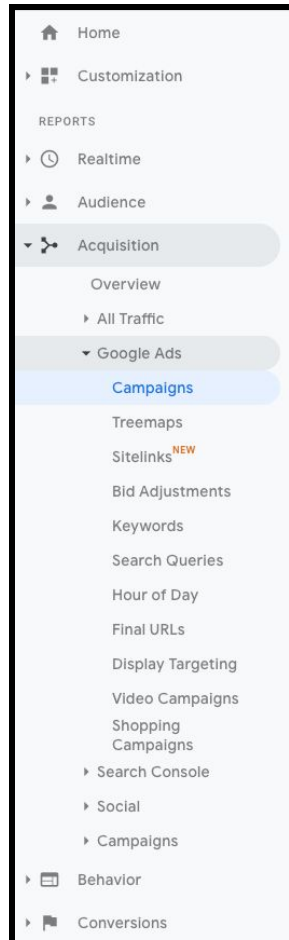
a.

2. Click on Google Ads



a.

3. Click on Display Targeting



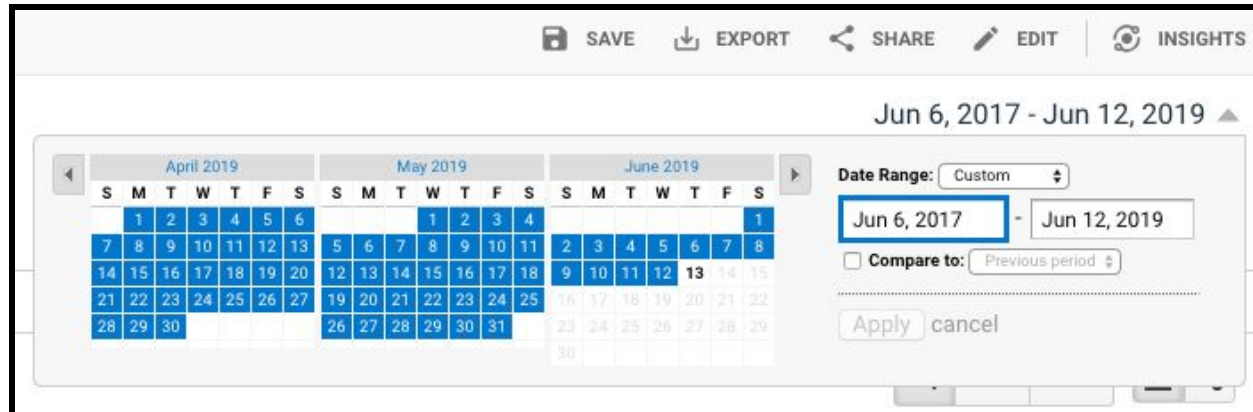
a.

4. Click on the Date Range



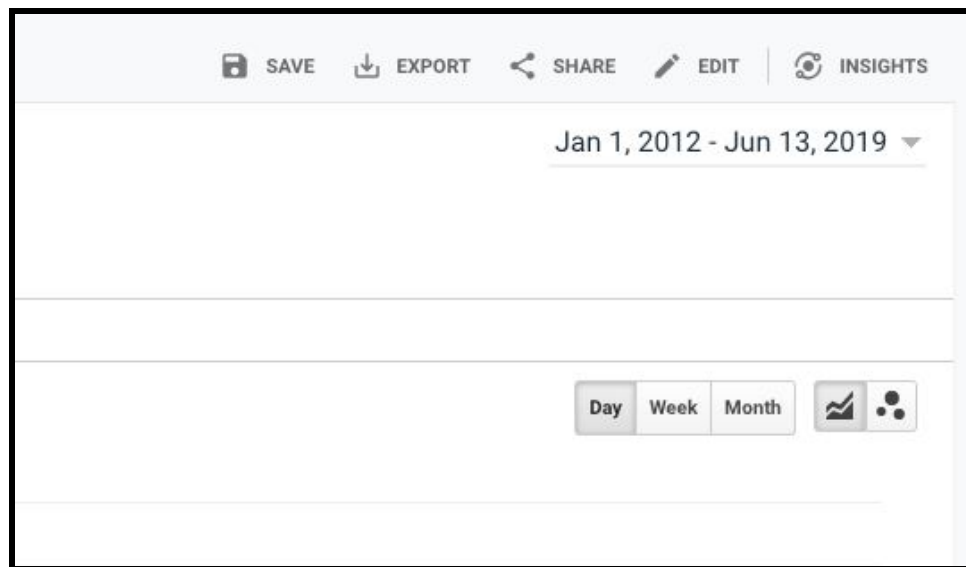
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



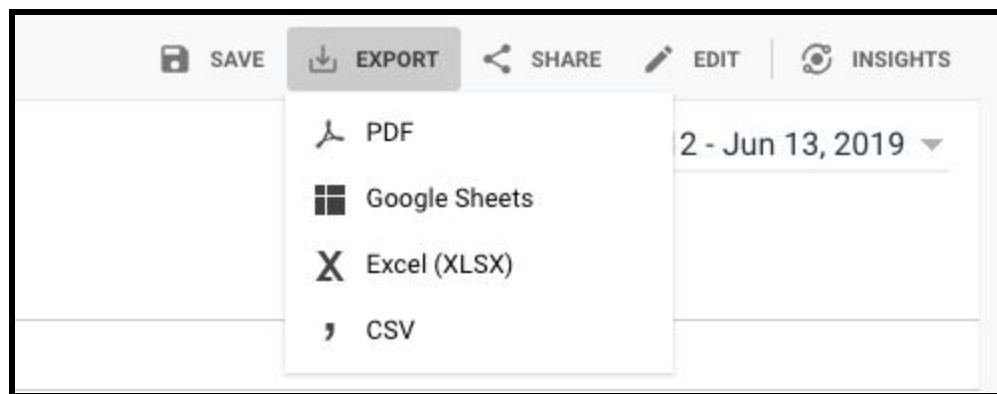
a.

6. Click on Export



a.

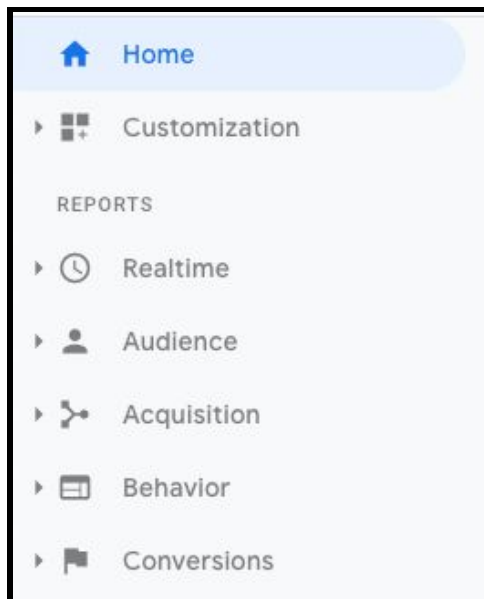
7. Click on Excel (XLSX)



a.

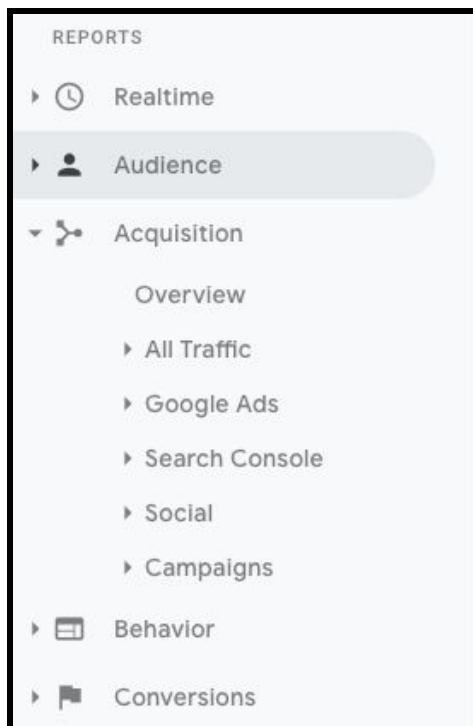
Acquisition Google Ads, Video Campaigns

1. Click on Acquisitions



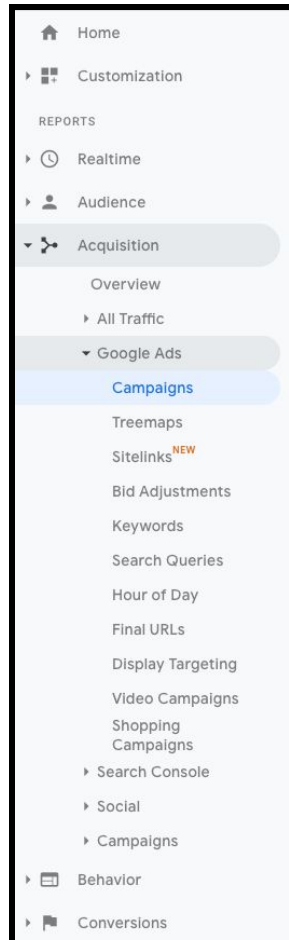
a.

2. Click on Google Ads



a.

3. Click on Video Campaigns



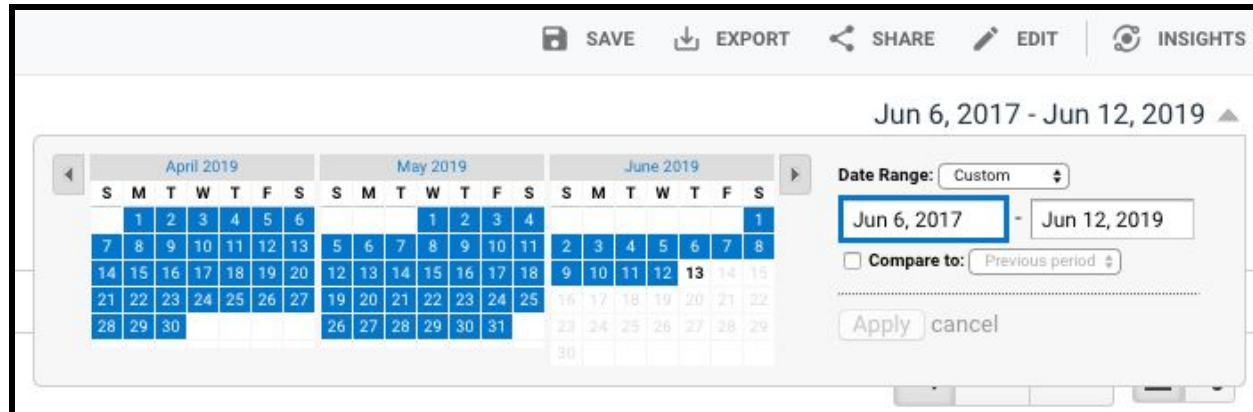
a.

4. Click on the Date Range



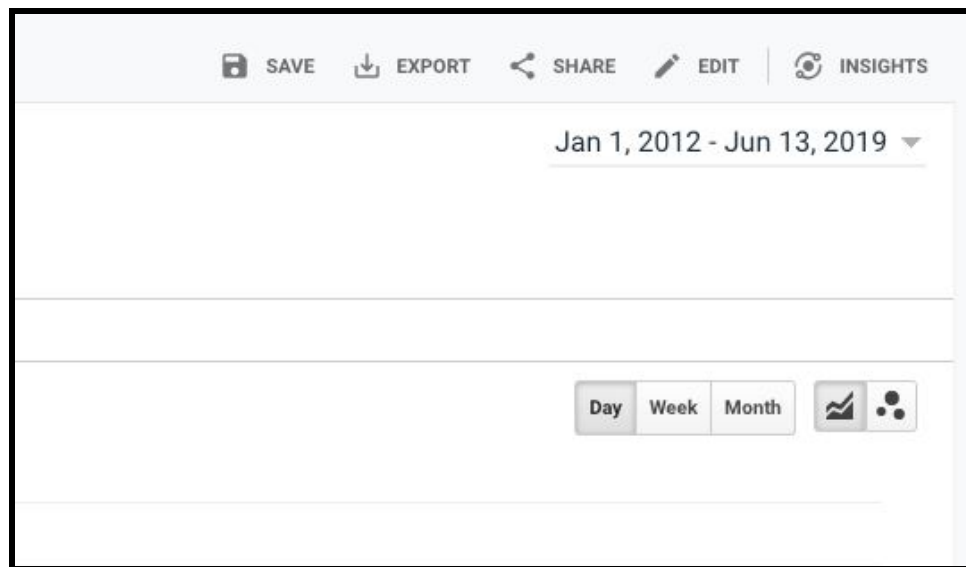
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



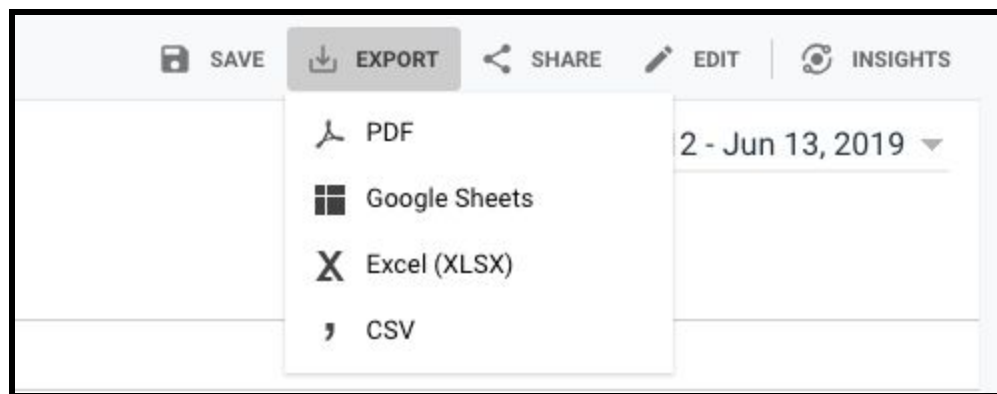
a.

6. Click on Export



a.

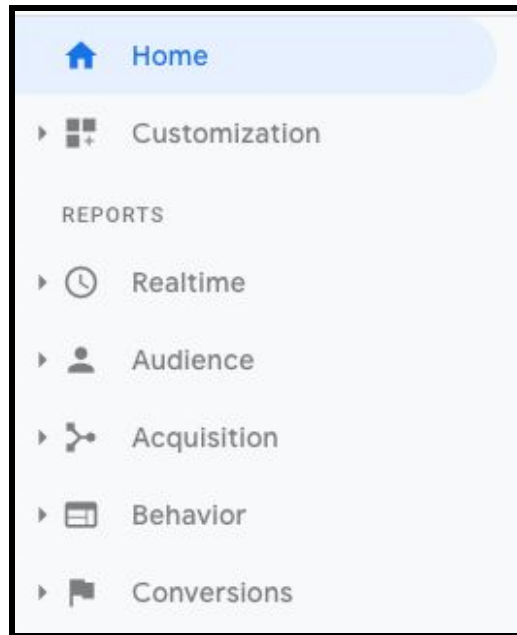
7. Click on Excel (XLSX)



a.

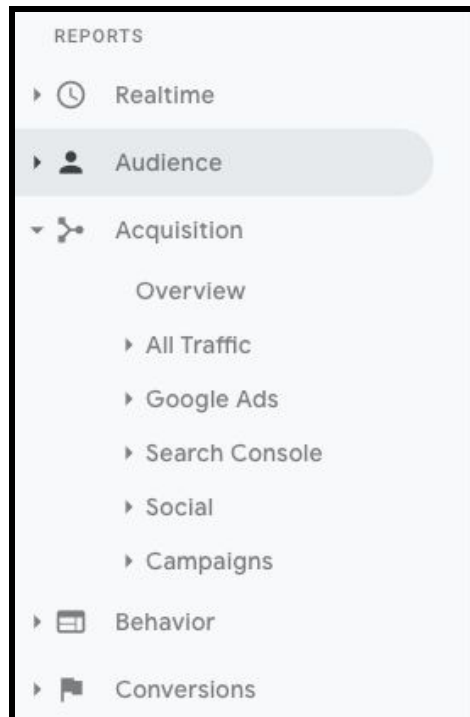
Acquisition Google Ads, Shopping Campaigns

1. Click on Acquisitions



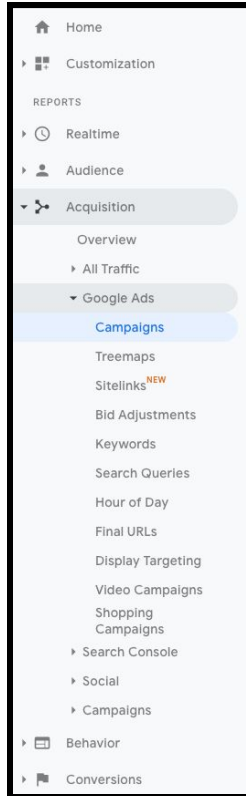
a.

2. Click on Google Ads



a.

3. Click on Shopping Campaigns



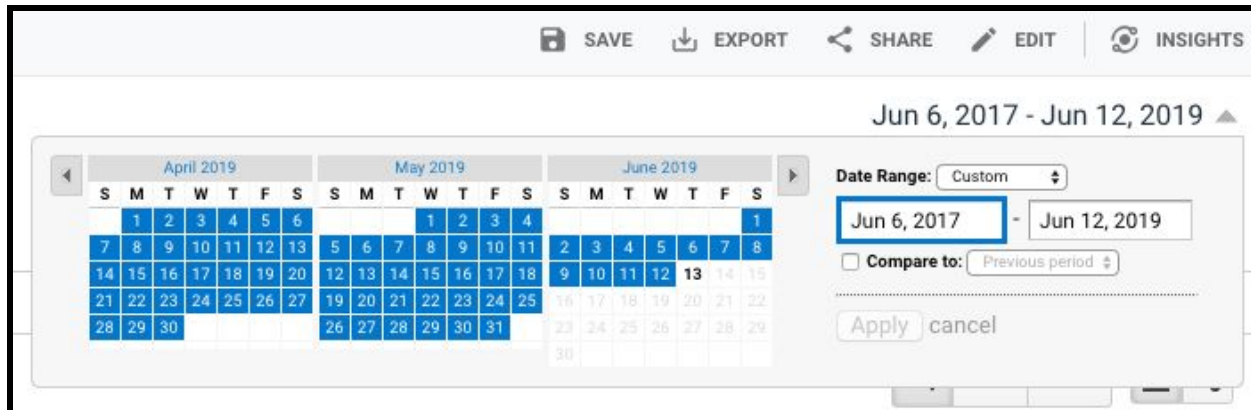
a.

4. Click on the Date Range



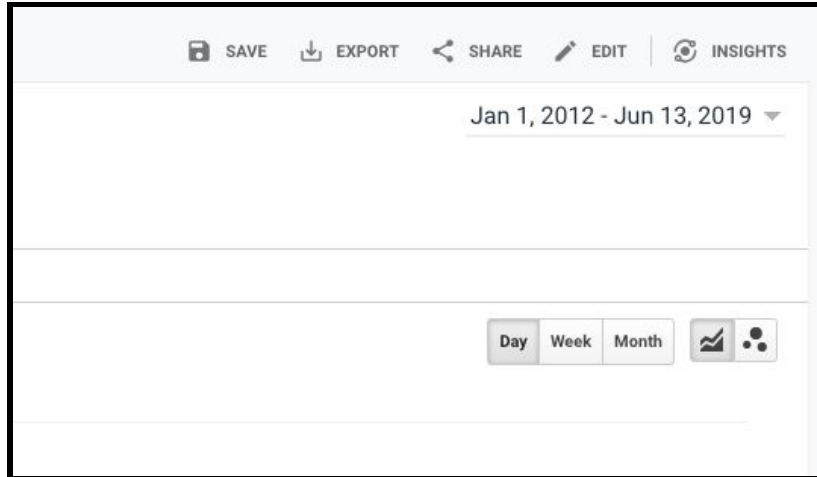
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



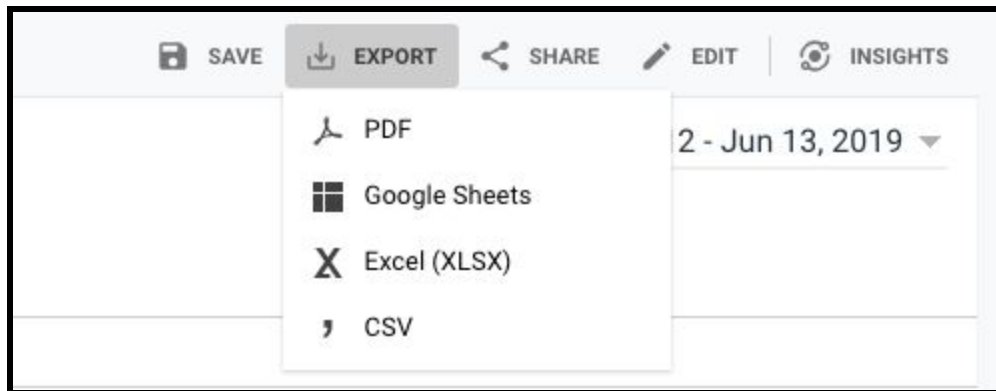
a.

6. Click on Export



a.

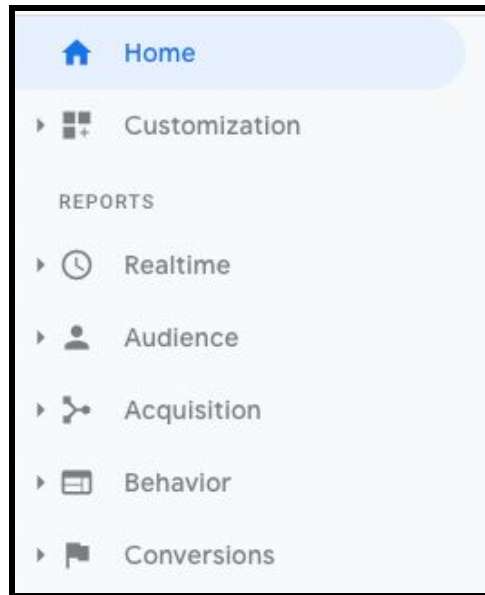
7. Click on Excel (XLSX)



a.

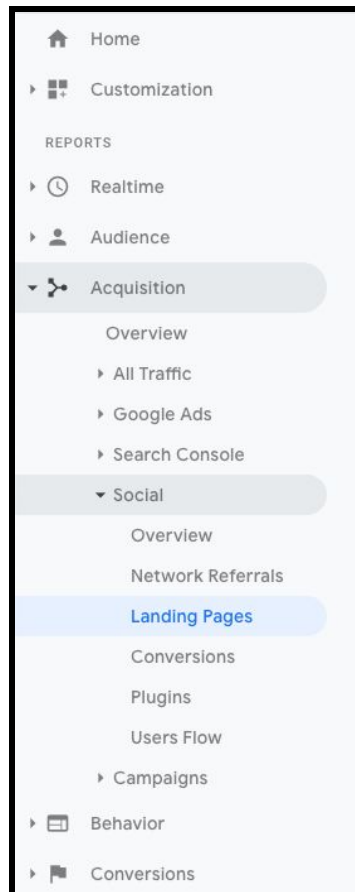
Social, Landing Pages

1. Click on Acquisition



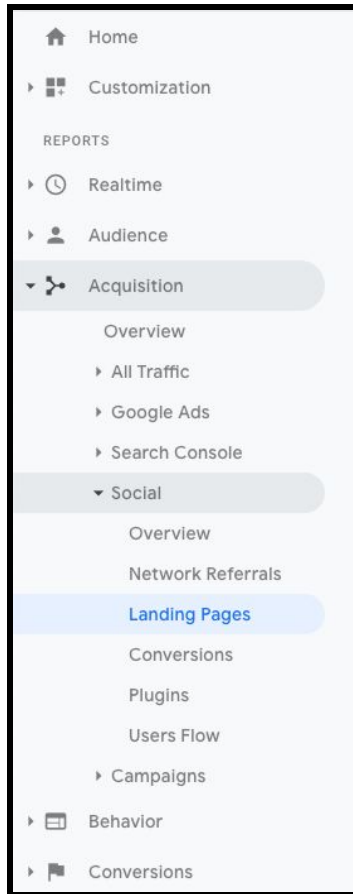
a.

2. Click on Social



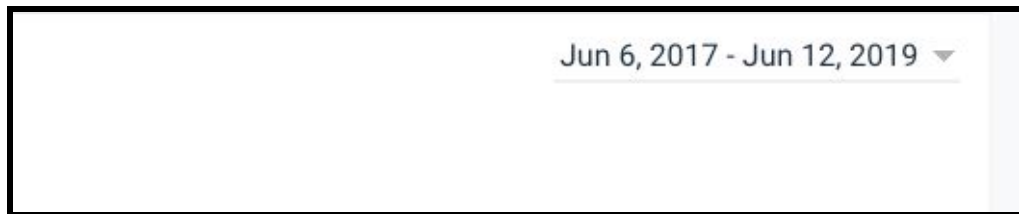
a.

3. Click on Landing Pages



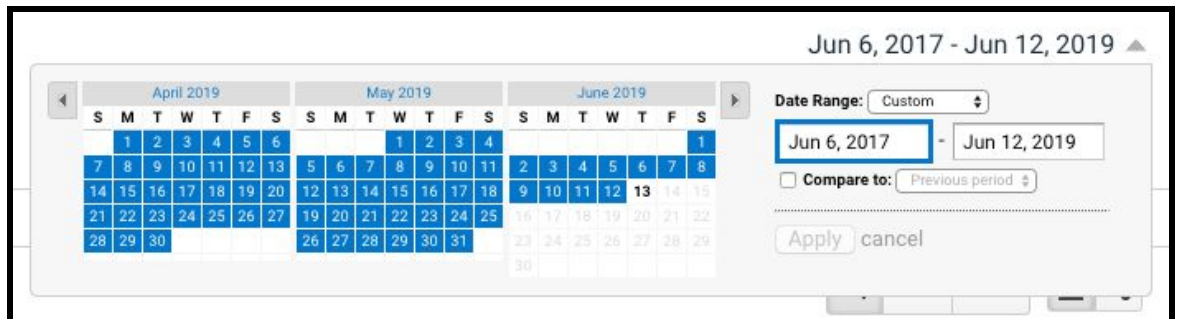
a.

4. Click on the Date Range



a.

5. Update Date Range to January 1, 2012 - December 31, 2019



a.

6. Click on Export

Landing Pages

Email Export ▾ Add to Dashboard Shortcut

a.

7. Click on Excel (XLSX)

Landing Pages

Email Export ▾ Add to Dashboard Shortcut

PDF

Google Sheets

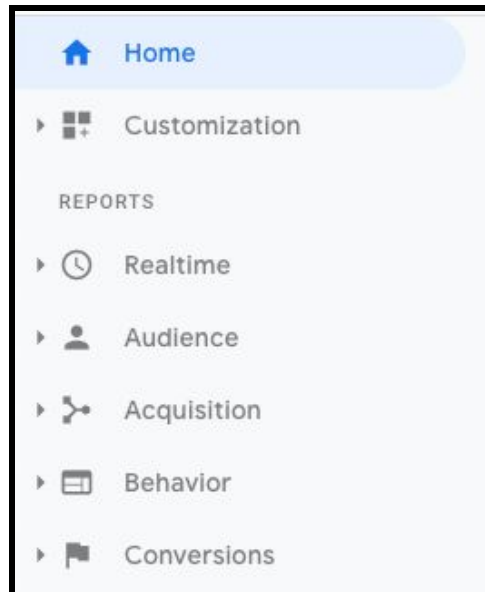
Excel (XLSX)

CSV

a.

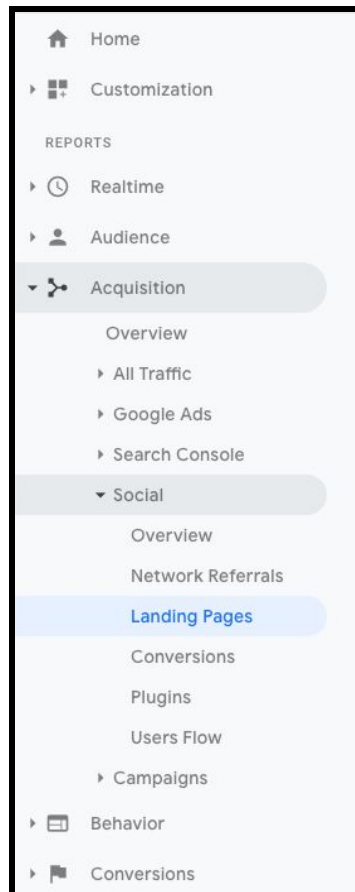
Social, Conversions

1. Click on Acquisition



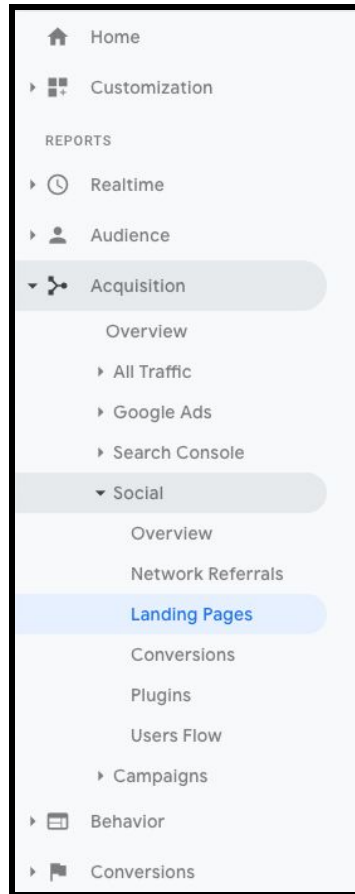
a.

2. Click on Social



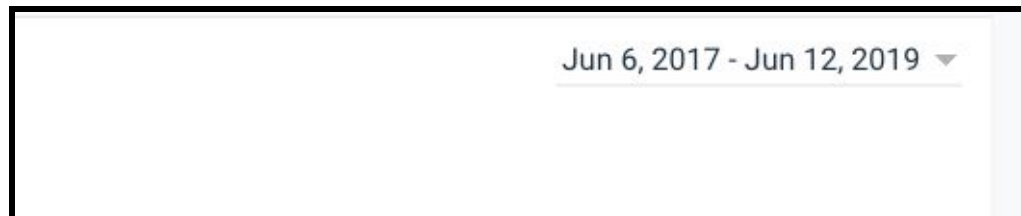
a.

3. Click on Conversions



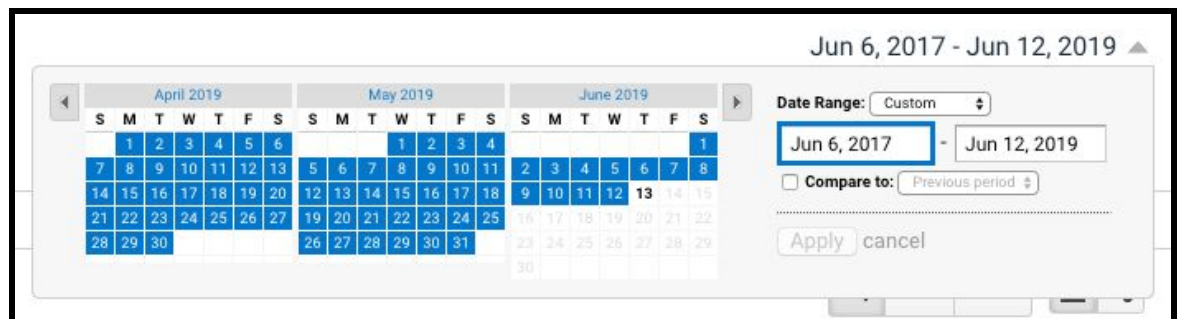
a.

4. Click on the Date Range



a.

5. Update Date Range to January 1, 2012 - December 31, 2019



a.

6. Click on Export

Landing Pages

Email Export Add to Dashboard Shortcut

a.

7. Click on Excel (XLSX)

SAVE

EXPORT

SHARE

EDIT

INSIGHTS

PDF

Google Sheets

Excel (XLSX)

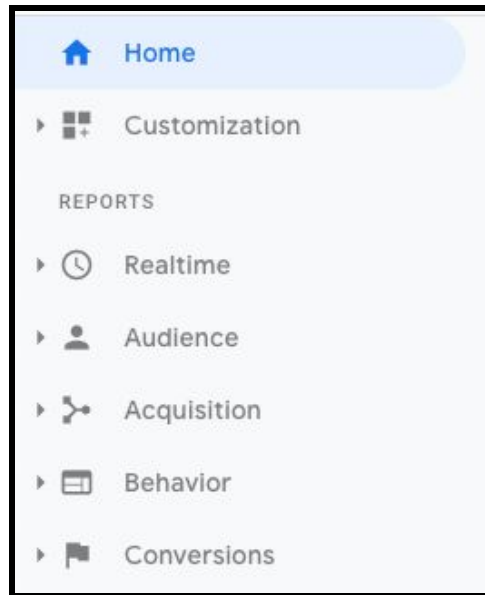
CSV

2 - Jun 13, 2019

a.

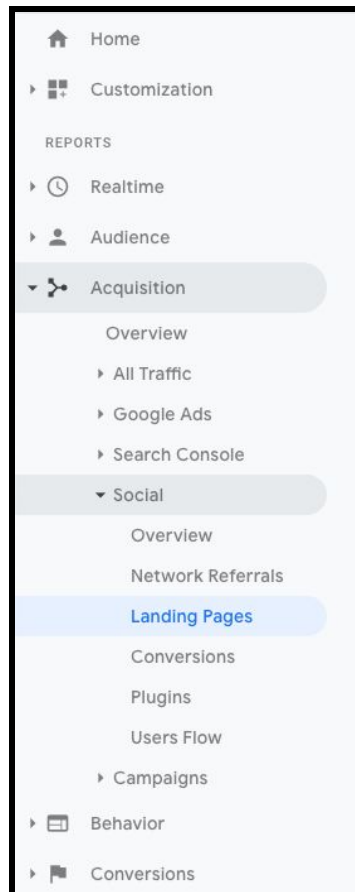
Social, User Flow

1. Click on Acquisition



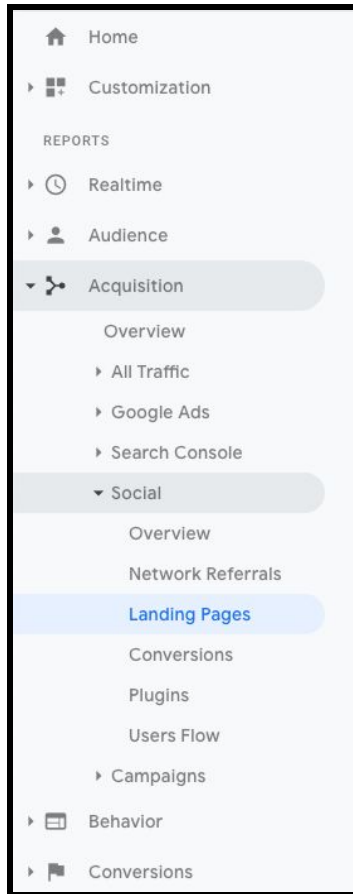
a.

2. Click on Social



a.

3. Click on User Flow



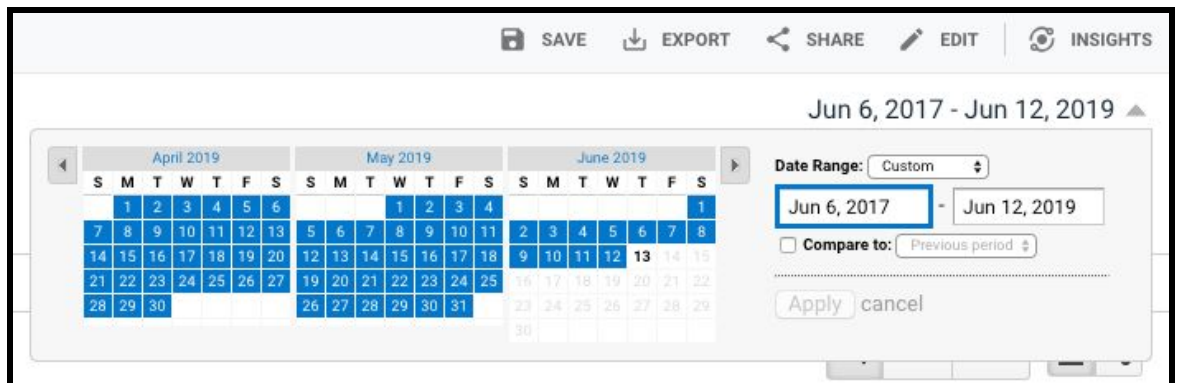
a.

4. Click on the Date Range



a.

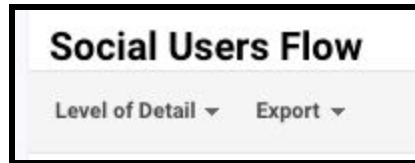
5. Update Date Range to January 1, 2012 - December 31, 2019



a.

6. Click on Level of Detail

a.



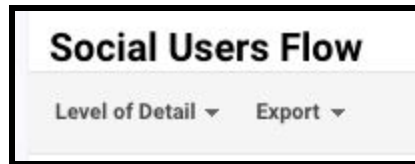
7. Click on the slider and move it all the way to “Show more connections”

a.



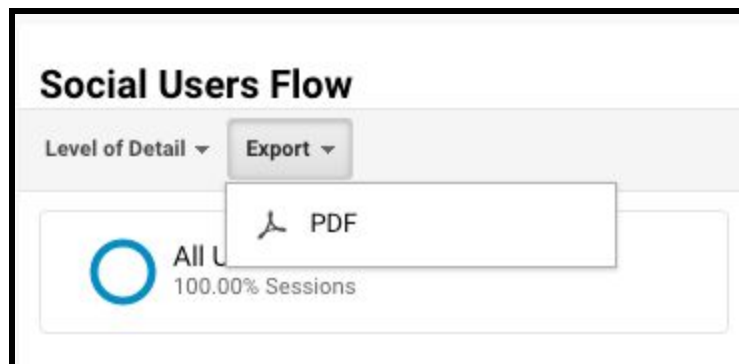
8. Click on Export

a.



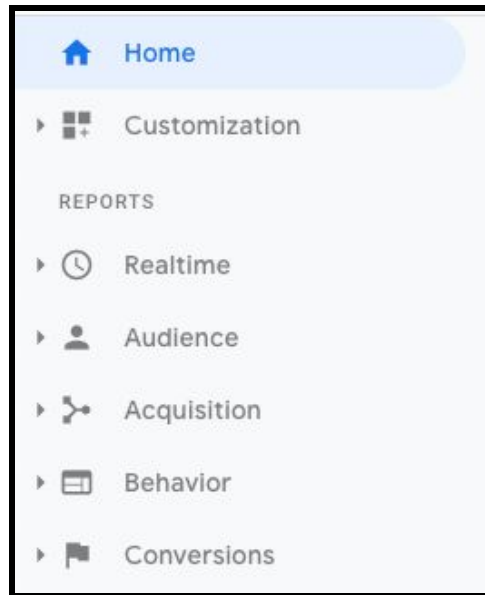
9. Click on PDF

a.



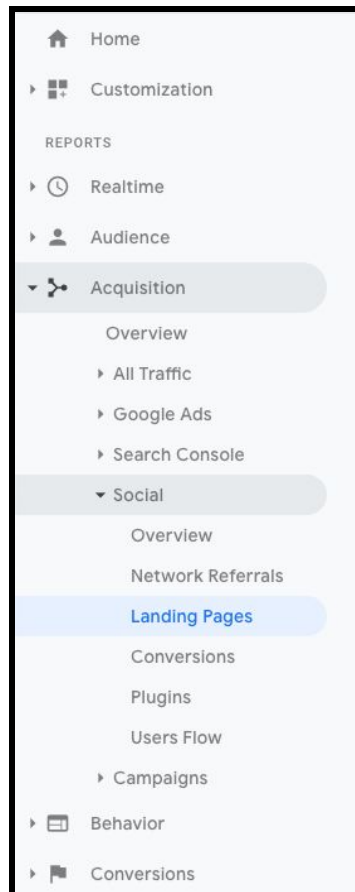
Insights, Domain Origin Export Excel

1. Click on Acquisition



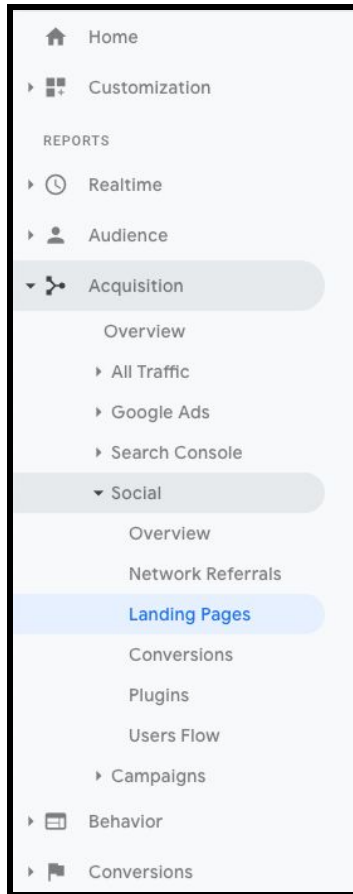
a.

2. Click on Social



a.

3. Click on User Flow



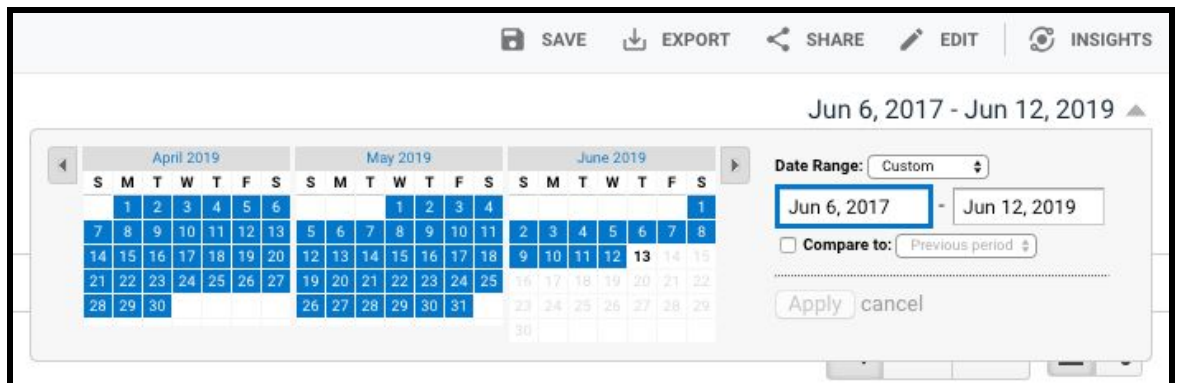
a.

4. Click on the Date Range



a.

5. Update Date Range to January 1, 2012 - December 31, 2019



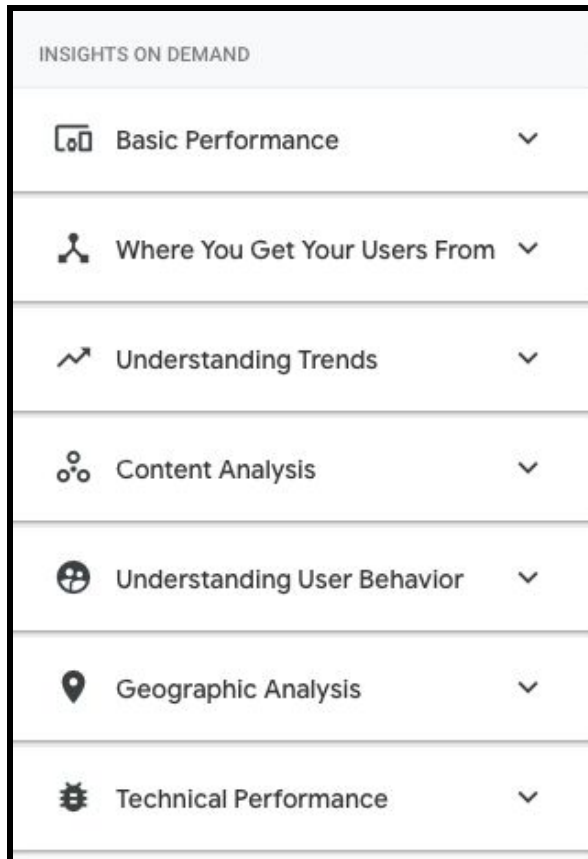
a.

6. Click on Insights







a.

7. Click on “Where You Get Your Users From”

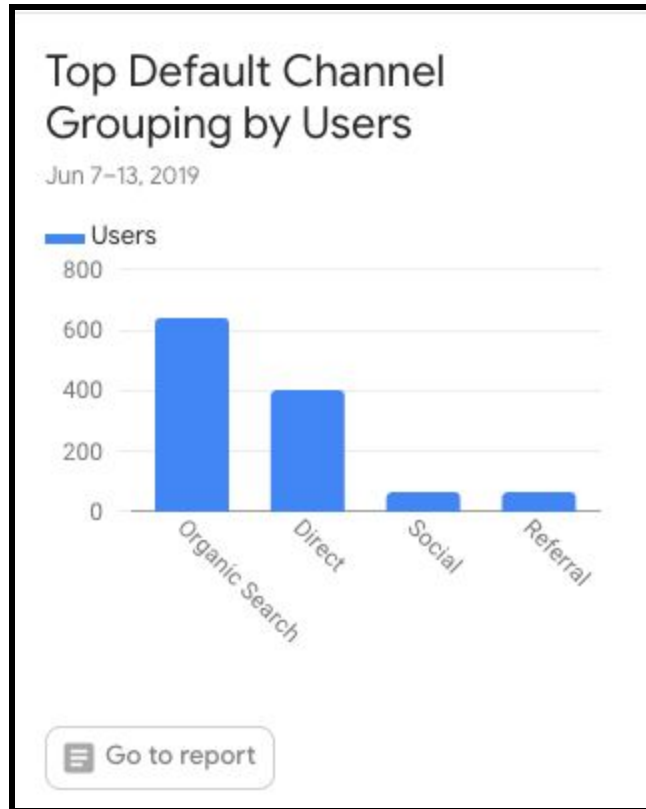


a.

8. Click on “What are my top default channel grouping by user?”

INSIGHTS ON DEMAND	
	Basic Performance 
	Where You Get Your Users From 
What are my top default channel groupings by user?	
What campaigns have the most sessions?	
Top campaigns by sessions excluding (not set) campaign over the last month	
Top campaigns by sessions excluding (not set) campaign over the last 30 days	
What percentage of my users came from organic search in the last 30 days?	
Compare users on medium of organic vs medium of referral in the last 30 days	

- a.
9. Click on "Go to report"



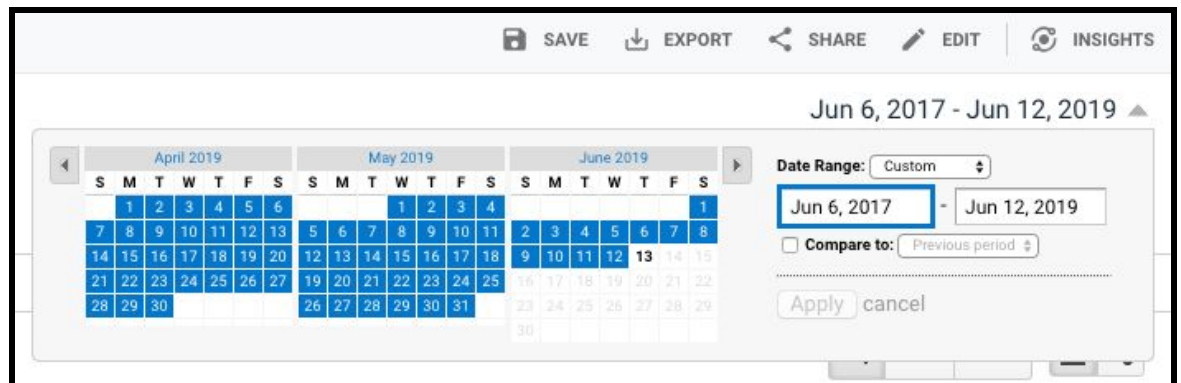
a.

10. Click on the Date Range



a.

11. Update Date Range to January 1, 2012 - December 31, 2019



a.

12. Click on Direct

<input type="checkbox"/>	Default Channel Grouping
<input type="checkbox"/>	1. Organic Search
<input type="checkbox"/>	2. Direct
<input type="checkbox"/>	3. Referral
<input type="checkbox"/>	4. Social

a.

13. Click on Export

SAVE
EXPORT
SHARE
EDIT
INSIGHTS

Jan 1, 2012 - Jun 13, 2019 ▼

Day
Week
Month

a.

14. Click on Excel (XLSX)

SAVE
EXPORT
SHARE
EDIT
INSIGHTS

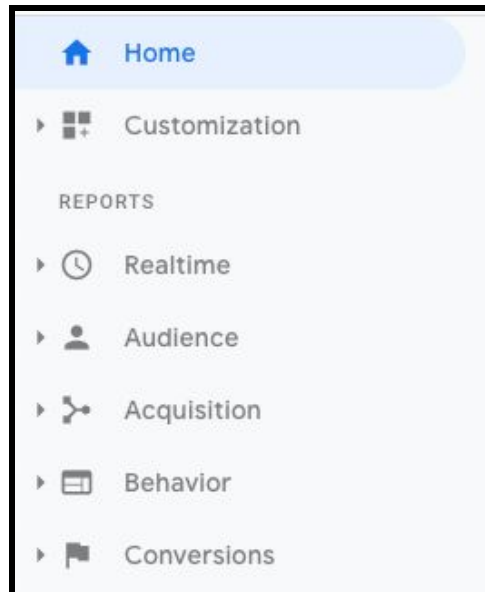
PDF
Google Sheets
Excel (XLSX)
CSV

2 - Jun 13, 2019 ▼

a.

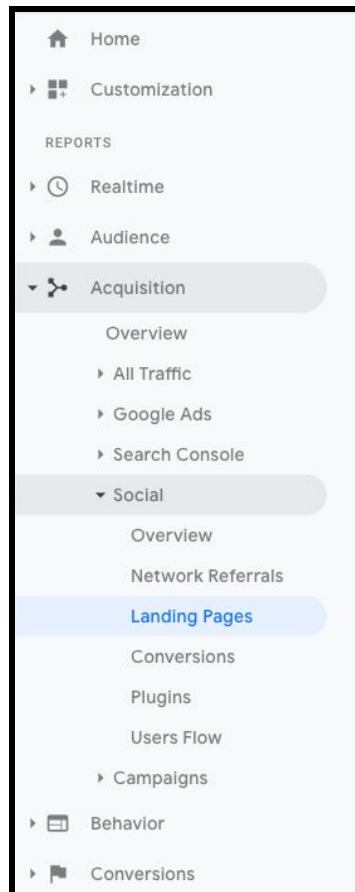
Insights, Domain Origin Export PDF

1. Click on Acquisition



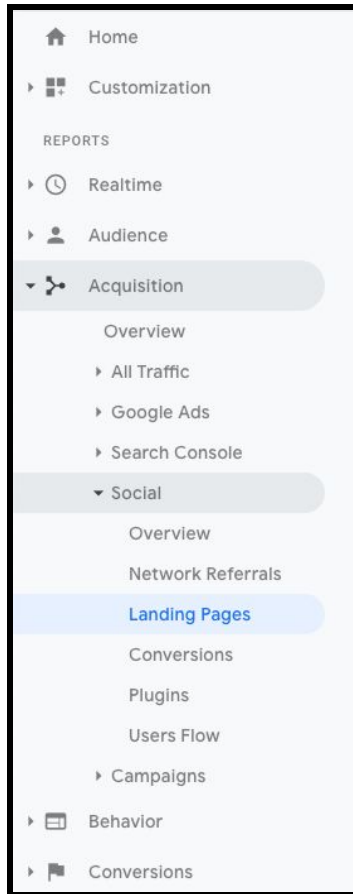
a.

2. Click on Social



a.

3. Click on User Flow



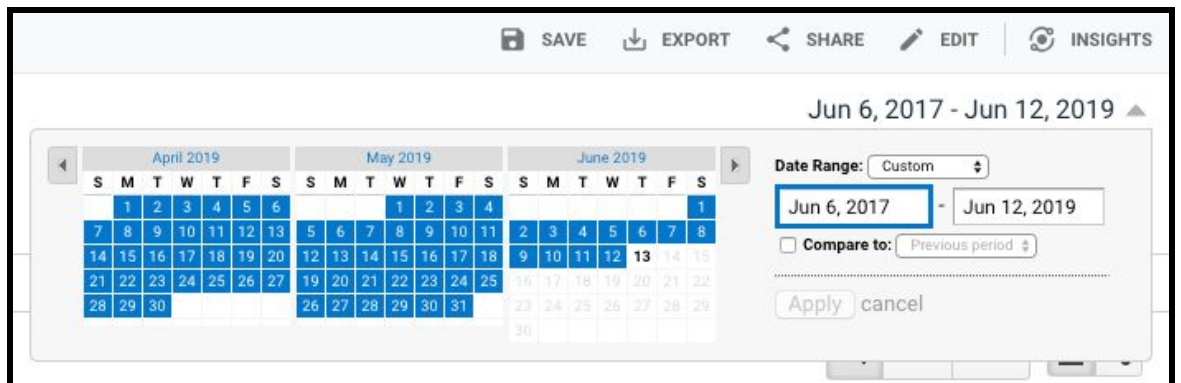
a.

4. Click on the Date Range



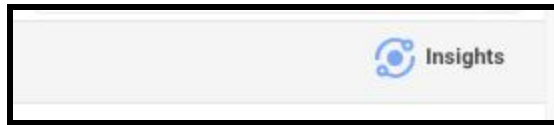
a.

5. Update Date Range to January 1, 2012 - December 31, 2019



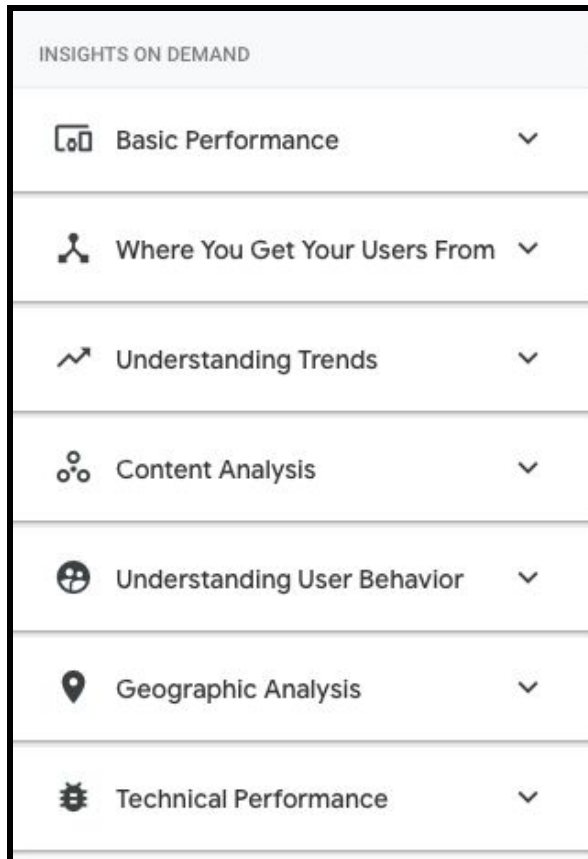
a.

6. Click on Insights







a.

7. Click on “Where You Get Your Users From”

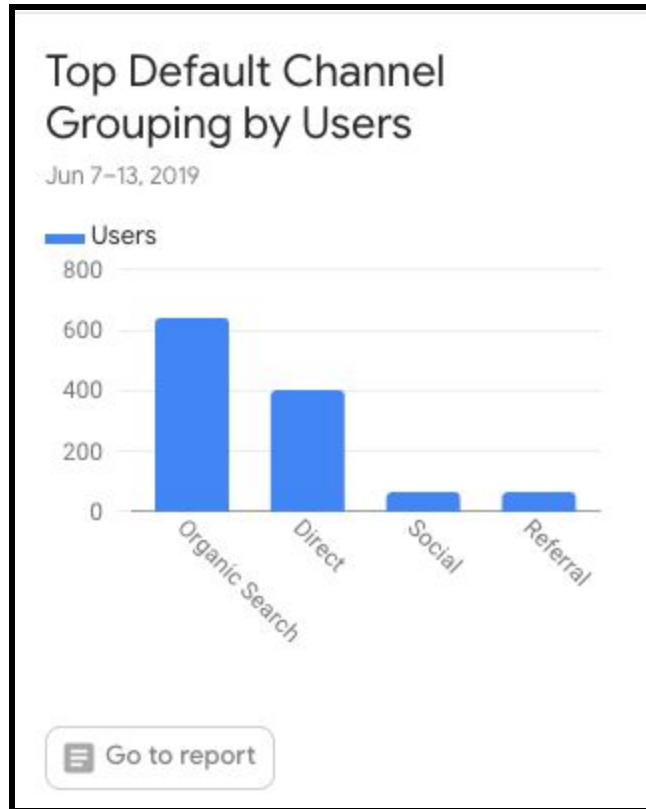


a.

8. Click on “What are my top default channel grouping by user?”

INSIGHTS ON DEMAND	
	Basic Performance 
	Where You Get Your Users From 
What are my top default channel groupings by user?	
What campaigns have the most sessions?	
Top campaigns by sessions excluding (not set) campaign over the last month	
Top campaigns by sessions excluding (not set) campaign over the last 30 days	
What percentage of my users came from organic search in the last 30 days?	
Compare users on medium of organic vs medium of referral in the last 30 days	

- a.
9. Click on "Go to report"



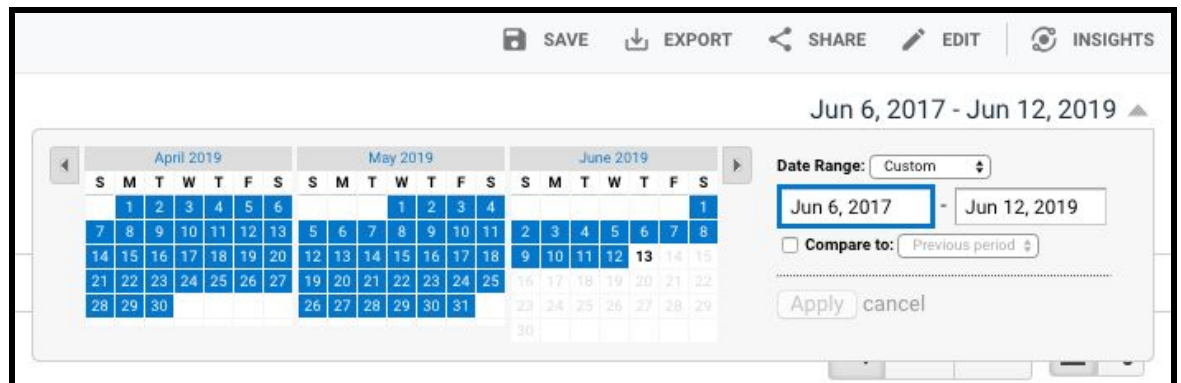
a.

10. Click on the Date Range



a.

11. Update Date Range to January 1, 2012 - December 31, 2019



a.

12. Click on Direct

<input type="checkbox"/>	Default Channel Grouping
<input type="checkbox"/>	
<input type="checkbox"/>	1. Organic Search
<input type="checkbox"/>	2. Direct
<input type="checkbox"/>	3. Referral
<input type="checkbox"/>	4. Social

a.

13. Click on show rows

Show rows: 10 Go to: 1 1 - 10 of 17 < >

a.

14. Click on "5000"

Show rows: 10 25 50 100 250 500 1000 2500 5000 Go to: 1 1 - 10 of 17 < >

is report was g /14/19 at 9:19:19 AM - [Refresh Report](#)

a.

15. Click on Export

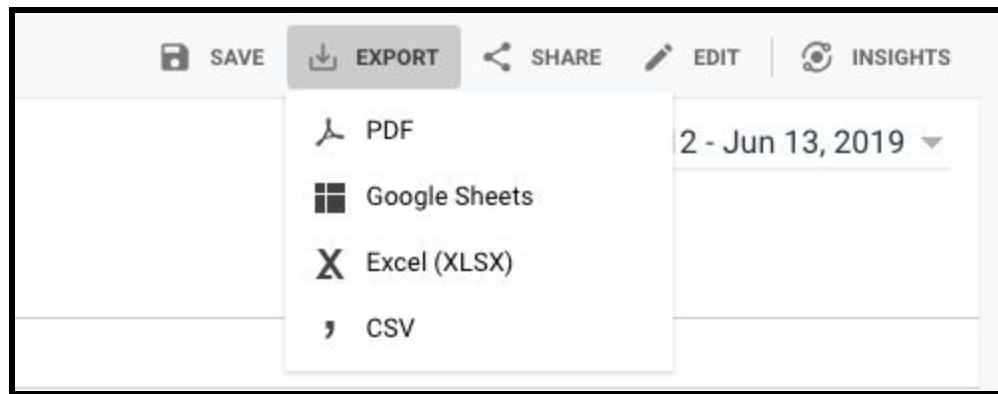
SAVE EXPORT SHARE EDIT INSIGHTS

Jan 1, 2012 - Jun 13, 2019 ▾

Day Week Month

a.

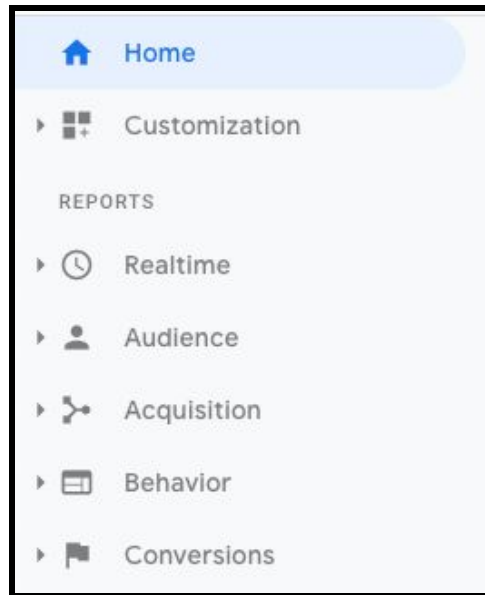
16. Click on PDF



a.

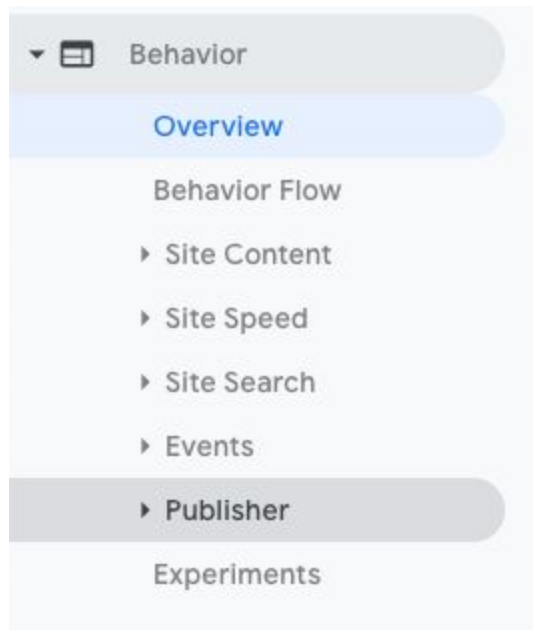
Behavior, Behavior Flow

1. Click on Behavior



a.

2. Click on Behavior Flow










a.

3. Click on Insights







a.

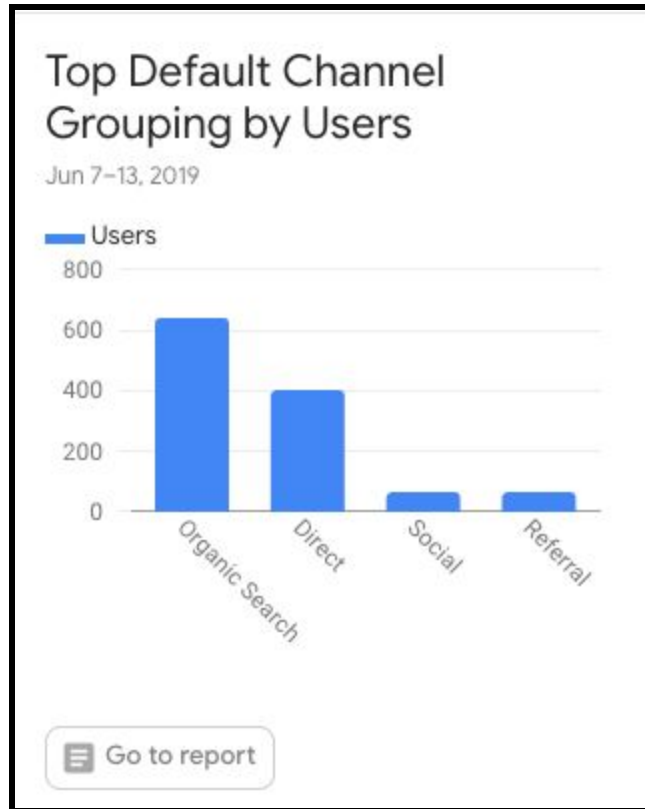
4. Click on "Where You Get Your Users From"

INSIGHTS ON DEMAND		
	Basic Performance	▼
	Where You Get Your Users From	▼
	Understanding Trends	▼
	Content Analysis	▼
	Understanding User Behavior	▼
	Geographic Analysis	▼
	Technical Performance	▼

- a.
5. Click on “What are my top default channel grouping by user?”

INSIGHTS ON DEMAND	
	Basic Performance 
	Where You Get Your Users From 
What are my top default channel groupings by user?	
What campaigns have the most sessions?	
Top campaigns by sessions excluding (not set) campaign over the last month	
Top campaigns by sessions excluding (not set) campaign over the last 30 days	
What percentage of my users came from organic search in the last 30 days?	
Compare users on medium of organic vs medium of referral in the last 30 days	

- a.
6. Click on "Go to report"



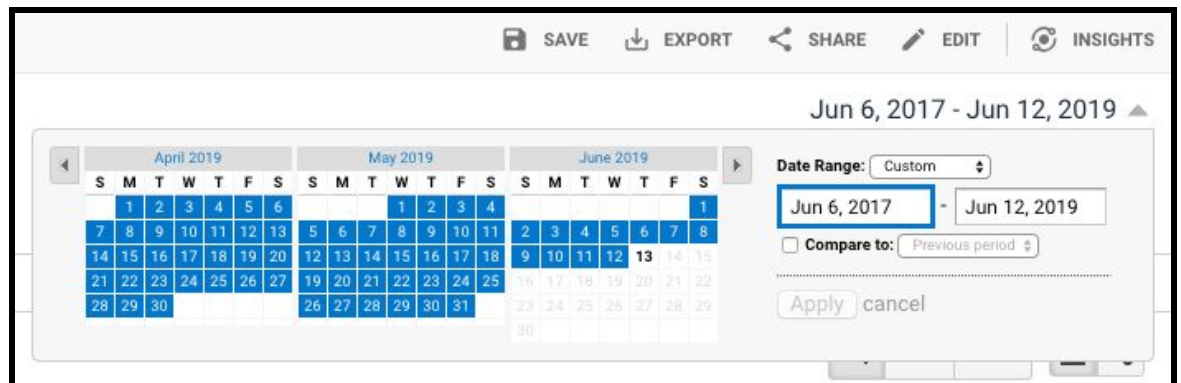
a.

7. Click on the Date Range



a.

8. Update Date Range to January 1, 2012 - December 31, 2019



a.

9. Click on Direct

<input type="checkbox"/>	Default Channel Grouping
<input type="checkbox"/>	1. Organic Search
<input type="checkbox"/>	2. Direct
<input type="checkbox"/>	3. Referral
<input type="checkbox"/>	4. Social

a.

10. Click on show rows

Show rows: Go to: 1 - 10 of 17

a.

11. Click on "5000"

Show rows: Go to: 1 - 10 of 17

is report was g /14/19 at 9:19:19 AM - [Refresh Report](#)



10
25
50
100
250
500
1000
2500
5000

a.

12. Click on Export

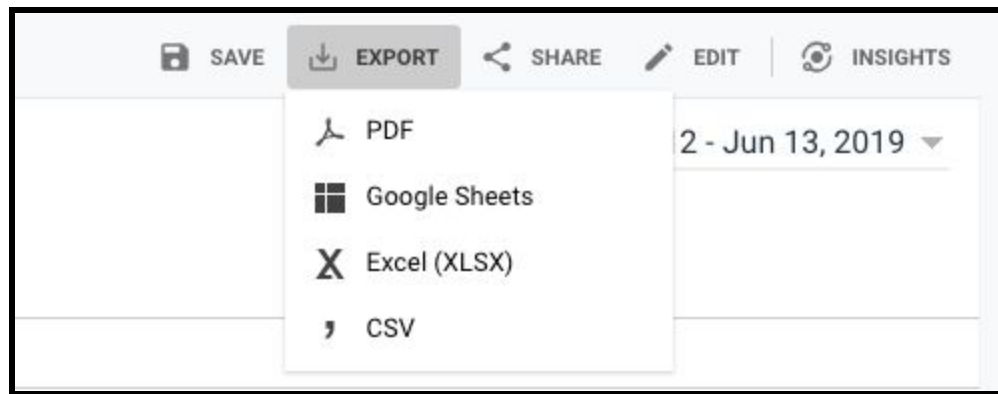
SAVE EXPORT SHARE EDIT INSIGHTS

Jan 1, 2012 - Jun 13, 2019 ▼

Day Week Month  

a.

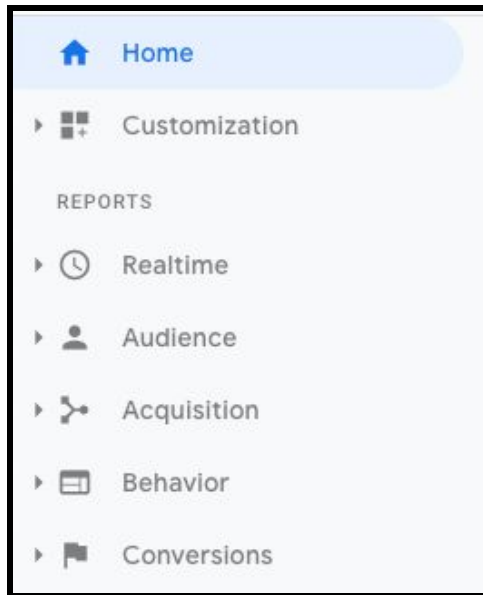
13. Click on PDF



a.

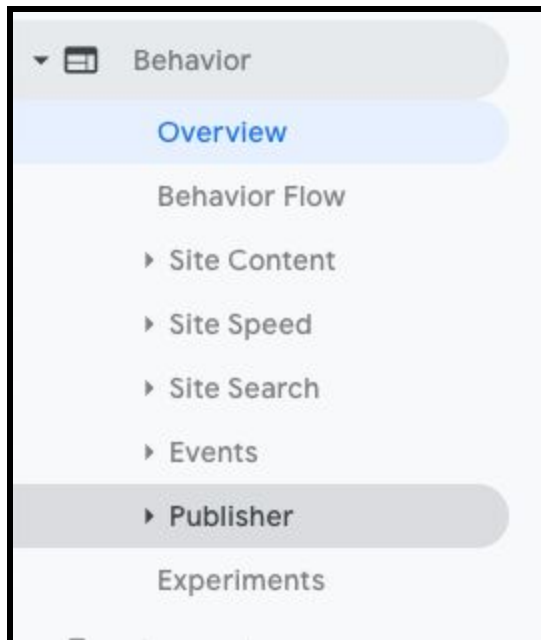
Behavior, Overview

1. Click on Behavior



a.

2. Click on Overview



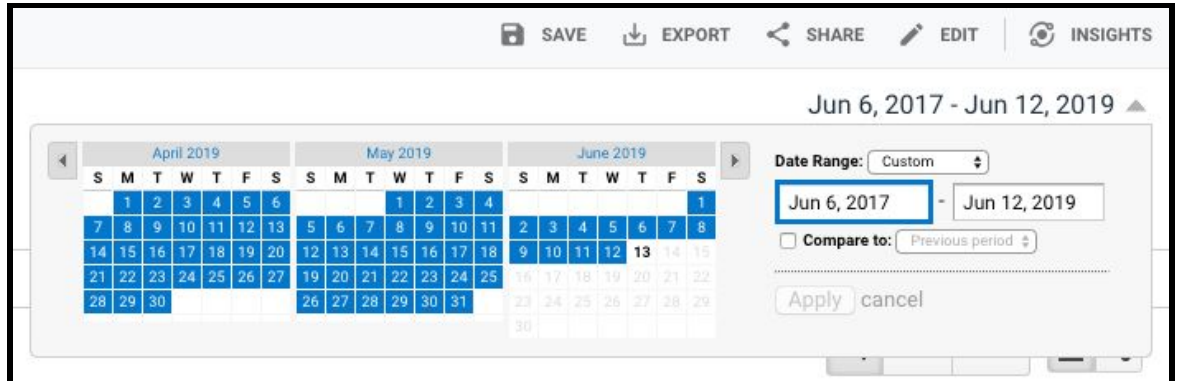
a.

3. Click on the Date Range



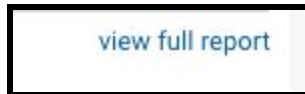
a.

4. Update Date Range to January 1, 2012 - December 31, 2019



a.

5. Click on view full report



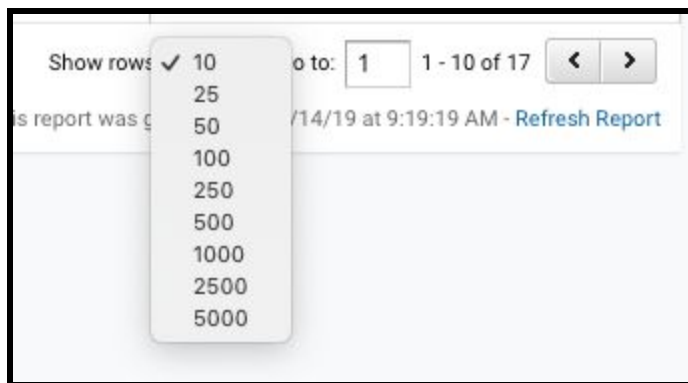
a.

6. Click on show rows



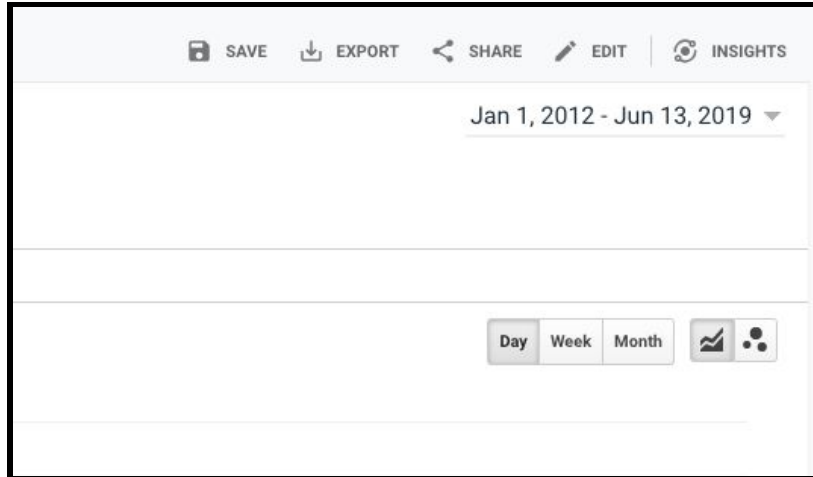
a.

7. Click on "5000"



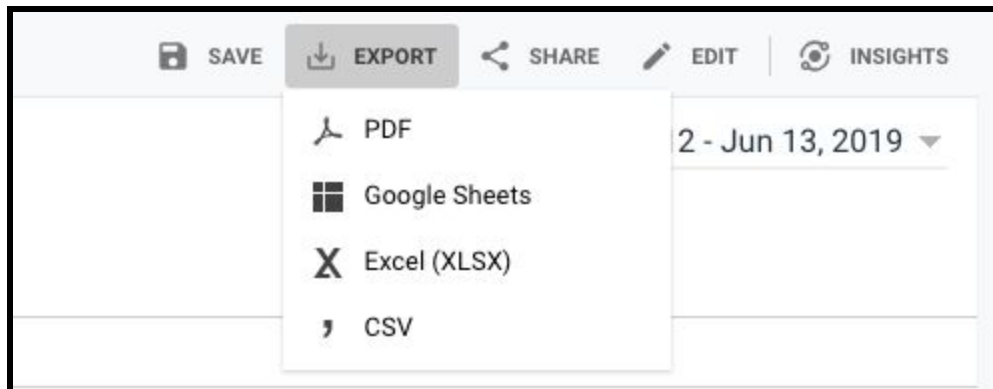
a.

8. Click on Export



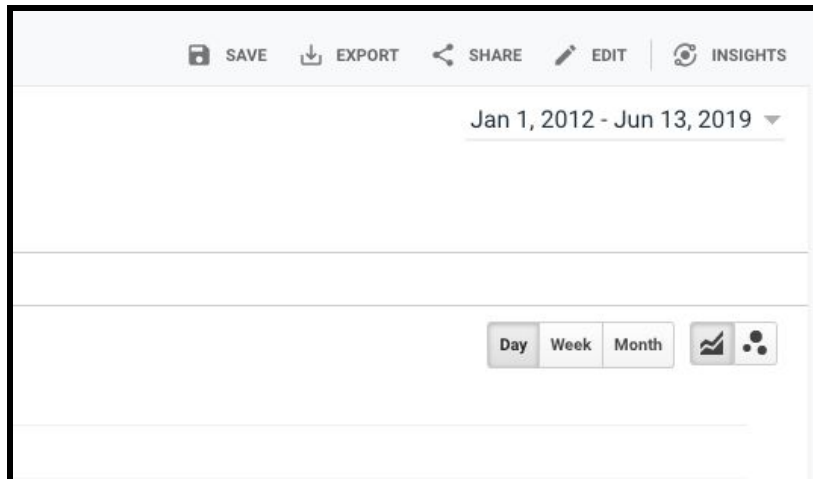
a.

9. Click on PDF



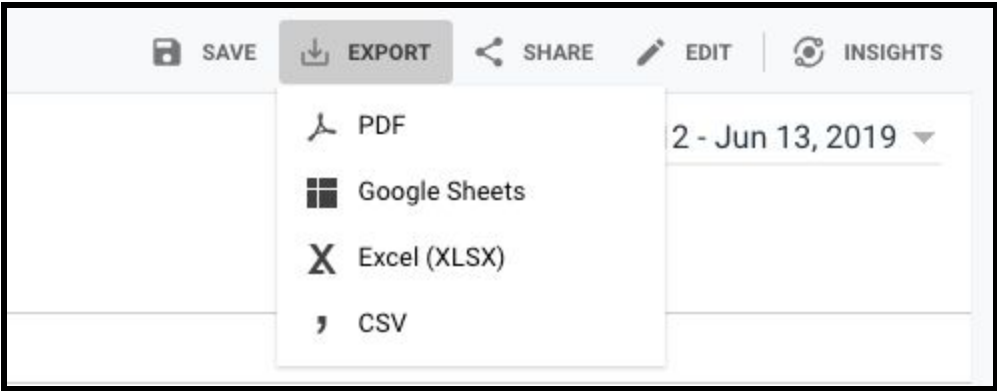
a.

10. Click on Export again



a.

11. Click on Excel (XLSX)



a.

Behavior, Landing Pages

1. Click on Behavior
2. Click on Site Content
3. Click on Landing Pages
4. Click on the Date Range
5. Use the search function below the graph to search for keywords or URLs that you would like to understand where users are coming to the site from and which URL they 'land on'
6. Update Date Range to January 1, 2012 - December 31, 2019
7. Click on Vs. and select Avg. time on page
8. Click on User started at this landing page and select
9. Click on view full report
10. Click on show rows
11. Click on "5000"
12. Click on Export
13. Click on PDF
14. Click on Export again
15. Click on Excel (XLSX)

Behavior, Exit Pages

1. Click on Behavior
2. Click on Site Content
3. Click on Exit Pages
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Use the search function below the graph to search for keywords or URLs that you would like to understand where users are leaving the site
7. Click on show rows
8. Click on "5000"
9. Click on Export
10. Click on PDF
11. Click on Export again
12. Click on Excel (XLSX)

Behavior, Content Drilldown (Page Path 1)

1. Click on Behavior
2. Click on Site Content
3. Click on Content Drilldown
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
7. In the drop down, select Behavior and scroll down to Page path level 2
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Behavior, Content Drilldown (Page Path 3)

1. Click on Behavior
2. Click on Site Content
3. Click on Content Drilldown
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
7. In the drop down, select Behavior and scroll down to Page path level 3
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Behavior, Content Drilldown (Page Path 4)

1. Click on Behavior
2. Click on Site Content
3. Click on Content Drilldown
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
7. In the drop down, select Behavior and scroll down to Page path level 4
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Behavior, Content Drilldown (Next Page Path)

1. Click on Behavior
2. Click on Site Content
3. Click on Content Drilldown
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
7. In the drop down, select Behavior and scroll down to Next Page Path
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Behavior, Site Search (Overview)

1. Click on Behavior
2. Click on Site Search
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Sessions with Search and change the search to any of the options in the drop down menu to further drill down into the content of the searches on the site and other relevant data.
7. Click on show rows
8. Click on "5000"
9. Click on Export
10. Click on PDF
11. Click on Export
12. Click on Excel (XLSX)

Behavior, Site Search (Search Terms)

1. Click on Behavior
2. Click on Site Search
3. Click on Search Terms
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Total Unique Searches box (below Site Usage) and change the search to any of the options in the drop down menu to further drill down into the content of the searches on the site and other relevant data.
- 7.
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export
13. Click on Excel (XLSX)

Behavior, Behavior Flow (Automatically Grouped Pages)

1. Click on Behavior
2. Click on Behavior Flow
3. Click on the Date Range
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on Level of Detail and move the slider all the way to the right
6. Click on + Add Segment and type in and search "New Users" in the upper right corner of the drop down menu
7. Click on new users
8. Click on Apply in the bottom left corner of the drop down menu
9. Click on Export
10. Click on PDF

Behavior, Behavior Flow (Pages and Events)

1. Click on Behavior
2. Click on Behavior Flow
3. Click on the Date Range
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on Automatically Grouped Pages located under behavior flow
6. Select "Pages and Events"
7. Click on + Add Segment and type in and search "New Users" in the upper right corner of the drop down menu
8. Click on new users
9. Click on Level of Detail and move the slider all the way to the right
10. Click on Export
11. Click on PDF

Behavior, Events

1. Click on Behavior
2. Click on Events
3. Click on the Overview
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on view full report located below the event category list on the bottom right
6. Click on show rows
7. Click on "5000"
8. Click on new users
9. Click on Level of Detail and move the slider all the way to the right
10. Click on Export
11. Click on PDF
12. Click on Export
13. Click on Excel (XLSX)

Behavior, Events (Referral Path)

1. Click on Behavior
2. Click on Events
3. Click on the Pages
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on show rows
6. Click on "5000"
7. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
8. Click on "Referral Path"
9. Click on Export
10. Click on PDF
11. Click on Export
12. Click on Excel (XLSX)

Behavior, Events (Full Referrer)

1. Click on Behavior
2. Click on Events
3. Click on the Pages
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on show rows
6. Click on "5000"
7. Click on Secondary dimension and type into the search bar "Full Referrer"
8. Click on "Full Referrer"
9. Click on ExportClick on PDF
10. Click on Export
11. Click on Excel (XLSX)

Audience, Overview

1. Click on Audience
2. Click on Behavior
3. Click on Site Search
4. Click on Search Terms
5. Click on the Date Range
6. Update Date Range to January 1, 2012 - December 31, 2019
7. Click on Total Unique Searches box (below Site Usage) and change the search to any of the options in the drop down menu to further drill down into the content of the searches on the site and other relevant data.
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export
13. Click on Excel (XLSX)

Audience, Behavior, New Vs Returning, Days to Transaction

1. Click on Audience
2. Click on Behavior
3. Click on New Vs ReturningClick on the Date Range
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
6. Click on Ecommerce from the drop down menu. Click on Days to Transaction from the drop down menu.
7. Click on show rows
8. Click on "5000"
9. Click on Export
10. Click on PDF
11. Click on Expor
12. Click on Excel (XLSX)

Audience, Behavior, Engagement, Session Duration

1. Click on Audience
2. Click on BehaviorClick on Engagement
3. Click on the Date Range
4. Update Date Range to January 1, 2012 - December 31, 2019Click on show rowsClick on "5000"
5. Click on Export
6. Click on PDF
7. Click on Export
8. Click on Excel (XLSX)

Audience, Behavior, Engagement, Page Depth

1. Click on Audience
2. Click on Behavior
3. Click on Engagement
4. Click on Page Depth, located below the Distribution tab
5. Click on the Date Range
6. Update Date Range to January 1, 2012 - December 31, 2019
7. Click on show rows
8. Click on "5000"
9. Click on Export
10. Click on PDF
11. Click on Export
12. Click on Excel (XLSX)

Audience, Behavior, New Vs Returning, Site Usage, Days to Transaction

1. Click on AudienceClick on BehaviorClick on New Vs ReturningClick on the Date Range
2. Update Date Range to January 1, 2012 - December 31, 2019
3. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
4. Click on Ecommerce from the drop down menu. Click on Days to Transaction from the drop down menu.
5. Click on "Site Usage" located below the "Explorer" Tab above the line graphClick on show rows
6. Click on "5000"
7. Click on Export
8. Click on PDF
9. Click on Export again
10. Click on Excel (XLSX)

Audience, Behavior, New Vs Returning, Ecommerce, Days to Transaction

1. Click on Audience
2. Click on Behavior
3. Click on New Vs Returning
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
6. Click on Ecommerce from the drop down menu. Click on Days to Transaction from the drop down menu
7. Click on "Ecommerce" located below the "Explorer" Tab above the line graph
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Audience, Behavior, New Vs Returning, Ecommerce, Days to Transaction

1. Click on Audience
2. Click on BehaviorClick on Frequency & Recency
3. Click on + Add Segment and type in and search "New Users" in the upper right corner of the drop down men
4. Click on + Add Segment and type in and search "Made a Purchase" in the upper right corner of the drop down menu
5. Click Apply in the bottom left corner of the "+NEW SEGMENT"
6. Click on the Date Range
7. Update Date Range to January 1, 2012 - December 31, 2019
8. Click Secondary dimension located on the bottom left of the line graph. It is also located next to Primary Dimension.
9. Click on show rows
10. Click on "5000"
11. Click on Export
12. Click on PDF
13. Click on Export again
14. Click on Excel (XLSX)

Audience, Interests (Affinity Category, Summery))

1. Click on Audience
2. Click on Interests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Affinity Category (reach)Note*
7. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Audience, Interests (Affinity Category, Site Usage))

1. Click on AudienceClick on Interests
2. Click on Overview
3. Click on the Date Range
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on Affinity Category (reach)
6. Click on "Site Usage" located to the left and above the line graph
7. *Note*
 - a. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Audience, Interests (Affinity Category, Ecommerce))

1. Click on Audience
2. Click on Interests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Affinity Category (reach)
7. Click on "Site Usage" located to the left and above the line graph
8. *Note*
 - a. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
9. Click on show rows
10. Click on "5000"
11. Click on Export
12. Click on PDF
13. Click on Export again
14. Click on Excel (XLSX)

Audience, Interests (Other Category, Summary))

1. Click on Audience
2. Click on Interests
3. Click on OverviewClick on the Date Range
4. Update Date Range to January 1, 2012 - December 31, 2019
5. Click on Other category
6. Note*
7. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
8. Click on show rows
9. Click on "5000"
10. Click on Export
11. Click on PDF
12. Click on Expor again
13. Click on Excel (XLSX)

Audience, Interests (Other Category, Site Usage))

1. Click on Audience
2. Click on Intrests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Other Category
7. Click on "Site Usage" located to the left and above the line graph
8. *Note*
 - a. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
9. Click on show rows
10. Click on "5000"
11. Click on Export
12. Click on PDF
13. Click on Export
1. Click on Excel (XLSX)

Audience, Interests (Other Category, Ecommerce))

1. Click on Audience
2. Click on Interests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Affinity Category (reach)
7. Click on "Ecommerce" located to the left and above the line graph
8. *Note*
 - a. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
9. Click on show rows
10. Click on "5000"
11. Click on Export
12. Click on PDF
13. Click on Export
14. Click on Excel (XLSX)

Audience, Interests (In-Market Segment, Summery))

1. Click on Audience
2. Click on Interests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Other category
7. *Note*
8. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
9. Click on show rows
10. Click on "5000"
11. Click on Export
12. Click on PDF
13. Click on Export
14. Click on Excel (XLSX)

Audience, Interests (In-Market Segment, Site Usage))

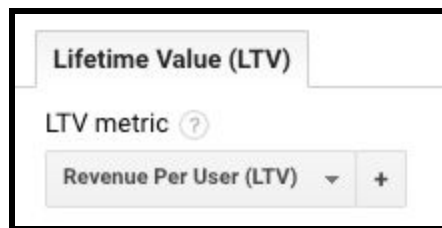
1. Click on Audience
2. Click on Interests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Other Category
7. Click on "Site Usage" located to the left and above the line graph
8. *Note*
9. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
10. Click on show rows
11. Click on "5000"
12. Click on Export
13. Click on PDF
14. Click on Export
15. Click on Excel (XLSX)

Audience, Interests (In-Market Segment, Ecommerce))

1. Click on Audience
2. Click on Interests
3. Click on Overview
4. Click on the Date Range
5. Update Date Range to January 1, 2012 - December 31, 2019
6. Click on Affinity Category (reach)
7. Click on "Ecommerce" located to the left and above the line graph
8. *Note*
9. a. The categories can be explored further by clicking on each one. If one group is of particular interest, the user can investigate additional information from the Google made categories.
9. Click on show rows
10. Click on "5000"
11. Click on Export
12. Click on PDF
13. Click on Export
14. Click on Excel (XLSX)

Audience, Lifetime Value (Revenue Per User (LTV))

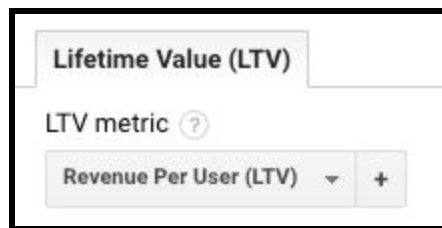
1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the “Lifetime Value (LTV)” tab.
4. *Note*
 - a. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
5. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
6. Click on the drop down menu below LTV Metric



- a.
7. Select from the dropdown menu “Revenue Per User (LTV)” if not already chosen
8. Click on show rows
9. Click on “5000”
10. Click on Export
11. Click on PDF
12. Click on Export again
13. Click on Excel (XLSX)

Audience, Lifetime Value (Pageviews Per User (LTV) Vs Revenue Per User (LTV))

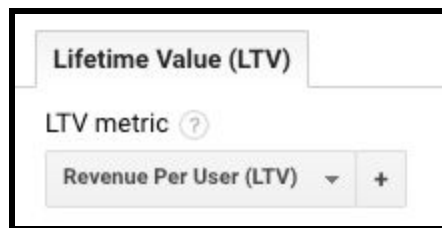
1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the “Lifetime Value (LTV)” tab.
4. *Note*
 - a. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
5. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
6. Click on the drop down menu below LTV Metric



- a.
7. Select from the dropdown menu “Pageviews Per User” if not already chosen
8. Select the + Icon located next to the dropdown menu
9. Click on the “Select one” located below the “Compare metric”
10. Select “Revenue Per User (LTV)”
11. Click on show rows
12. Click on “5000”
13. Click on Export
14. Click on PDF
15. Click on Export
16. Click on Excel (XLSX)

Audience, Lifetime Value (Pageviews Per User (LTV) Vs Transactions Per User (LTV))

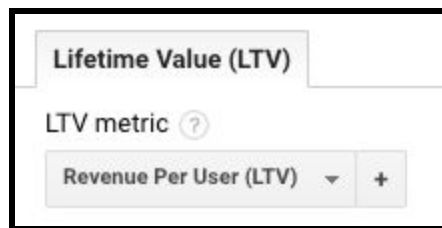
1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the “Lifetime Value (LTV)” tab.
4. *Note*
 - a. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
5. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
6. Click on the drop down menu below LTV Metric



- a.
7. Select from the dropdown menu “Pageviews Per User” if not already chosen
8. Select the + Icon located next to the dropdown menu
9. Click on the “Select one” located below the “Compare metric”
10. Select “Transactions Per User (LTV)”
11. Click on show rows
12. Click on “5000”
13. Click on Export
14. Click on PDF
15. Click on Export
16. Click on Excel (XLSX)

Audience, Lifetime Value (Session Duration Per User (LTV) Vs Revenue Per User (LTV))

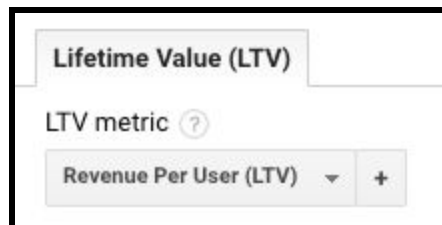
1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the "Lifetime Value (LTV)" tab.
4. *Note*
 - a. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
5. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
6. Click on the drop down menu below LTV Metric



- a.
7. Select from the dropdown menu "Session Duration Per User" if not already chosen
8. Select the + Icon located next to the dropdown menuClick on the "Select one" located below the "Compare metric"
9. Select "Revenue Per User (LTV)"
10. Click on show rows
11. Click on "5000"
12. Click on Export
13. Click on PDF
14. Click on Export
15. Click on Excel (XLSX)

Audience, Lifetime Value (Session Duration Per User (LTV) Vs Transactions Per User (LTV))

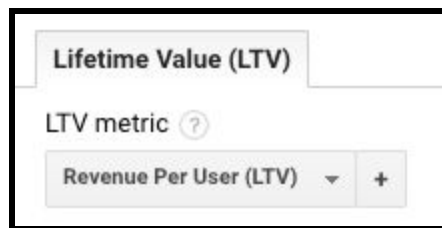
1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the “Lifetime Value (LTV)” tab.
4. *Note*
 - a. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
5. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
6. Click on the drop down menu below LTV Metric



- a.
7. Select from the dropdown menu “Session Duration Per User” if not already chosen
8. Select the + Icon located next to the dropdown menu
9. Click on the “Select one” located below the “Compare metric”
10. Select “Transactions Per User (LTV)”
11. Click on show rows
12. Click on “5000”
13. Click on Export
14. Click on PDFClick on Export
15. Click on Excel (XLSX)

Audience, Lifetime Value (Goal Completions Vs Revenue Per User (LTV))

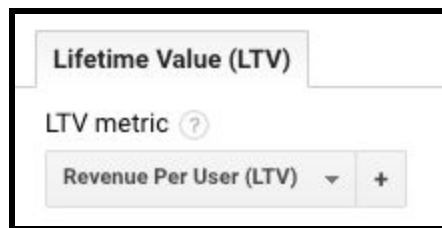
1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the "Lifetime Value (LTV)" tab.
4. *Note*
5. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
6. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
1. Click on the drop down menu below LTV Metric



7. Select from the dropdown menu "Goal Completions Per User (LTV) if not already chosen
8. Select the + Icon located next to the dropdown menu
9. Click on the "Select one" located below the "Compare metric"
10. Select "Revenue Per User (LTV)"
11. Click on show rows
12. Click on "5000"
13. Click on Export
14. Click on PDF
15. Click on Export
16. Click on Excel (XLSX)

Audience, Lifetime Value (Goal Completions Vs Revenue Per User (LTV))

1. Click on Audience
2. Click on Lifetime Value
3. Click on Acquisition Date Range, below the "Lifetime Value (LTV)" tab
4. *Note*
5. The Acquisition Date Range can be set to any time and therefore will track the value of a customer from the indicated time period. The following instructions are a recommendation but the if the user wants to gain a different view of the lifetime value of customers during a different time period they can set the Acquisition Date Range differently.
6. Update Acquisition Date Range to January 1, 2012 - January 1, 2017
1. Click on the drop down menu below LTV Metric



7. Select from the dropdown menu "Goal Completions Per User (LTV) if not already chosen
8. Select the + Icon located next to the dropdown menu
9. Click on the "Select one" located below the "Compare metric"
10. Select "Tenure"
11. Click on show rows
12. Click on "5000"
13. Click on Export
14. Click on PDF
15. Click on Export
16. Click on Excel (XLSX)

Exhibit B

June 17, 2019 Email Correspondence
Containing Google Analytics Data

RANDAZZA

LEGAL GROUP

From: Norm Pattis <NPattis@pattisandsmith.com>

Date: Monday, June 17, 2019 at 7:56 PM

To: Zach Reiland <zreiland@pattisandsmith.com>, "CMattei@koskoff.com" <CMattei@koskoff.com>, "ASterling@koskoff.com" <ASterling@koskoff.com>

Subject: Herewith analytics data

Sent from my iPhone

Begin forwarded message:

From: "Michael Zimmermann" <zimmermann@infowars.com>

To: "Norm Pattis" <NPattis@pattisandsmith.com>, "Zach Reiland" <zreiland@pattisandsmith.com>

Subject: Google Analytics Data [infowars.com]

Attached is the Google Analytics data for infowars.com.

We are now working on exporting the other sites. Additionally, some of the searches did not return data due to those features not being used in our account. (For example, google ads was never linked to our Google Analytics so there is no data there).

Acquisition, Social, Conversions (Assisted vs. Last Interaction Analysis) – No Data

Acquisition, Social, Conversions (Secondary Dimension Ad Content) – No Data

Acquisition, Social, Conversions (Secondary Dimension Ad Content Path) – No Data

Acquisition Campaigns (Paid Keywords) – No Data

Acquisition Google Ads, Campaigns – No Data

Acquisition Google Ads, Sitelinks – No Data

Acquisition Google Ads, Display Targeting - Does not exist

Acquisition Google Ads, Video Campaigns – Does not exist

Acquisition Google Ads, Shopping Campaigns – Does not exist

Social, Conversions – No Data

Audience, Lifetime Value (Pageviews Per User (LTV) Vs Revenue Per User (LTV)) – Date range too long. Must be less than two years.

Audience, Lifetime Value (Pageviews Per User (LTV) Vs Transactions Per User (LTV)) – Date range too long. Must be less than two years.

Audience, Lifetime Value (Session Duration Per User (LTV) Vs Revenue Per User (LTV)) - – Date range too long. Must be less than two years.

Audience, Lifetime Value (Session Duration Per User (LTV) Vs Transactions Per User (LTV)) - – Date range too long. Must be less than two years.

Audience, Lifetime Value (Goal Completions Vs Revenue Per User (LTV)) - -- Date range too long. Must be less than two years.

2 attachments



AnalyticsInfowars.com.zip

10371K



ATT00001.htm

1K

Exhibit C
Declaration of Michael
Zimmermann

DOCKET NO: UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL., :
VS. : COMPLEX LITIGATION DOCKET
ALEX EMRIC JONES, ET AL. : AT WATERBURY

DOCKET NO: UWY-CV-18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH, :
VS. : COMPLEX LITIGATION DOCKET
ALEX EMRIC JONES, ET AL. : AT WATERBURY

DOCKET NO: UWY-CV-18-6046438-S : SUPERIOR COURT
WILLIAM SHERLACH, ET AL., :
VS. : COMPLEX LITIGATION DOCKET
ALEX EMRIC JONES, ET AL. : AT WATERBURY

DECLARATION OF MICHAEL ZIMMERMANN

I, Michael Zimmermann, declare under penalty of perjury:

1. I am over the age of 18 years and am fully competent to make this Declaration.
2. The facts set forth in this Declaration are within my personal knowledge and are true and correct to the best of my knowledge and belief.
3. I am an employee or person with knowledge of the individual and corporate entities named as Defendants in the above-captioned matter.
4. I am a citizen and resident of the State of Texas.
5. I was an employee of Free Speech Systems, LLC in June of 2019. In that position, I worked in the Information Technology department of Free Speech Systems, LLC.

6. On or after June 15, 2019, I reviewed the "Step by Step.pdf" document transmitted to Attorney Norm Pattis by Plaintiffs' counsel as appearing in **Exhibit A.**

7. On or before June 17, 2019, I followed the instructions of the "Step by Step.pdf" document, the results of which were produced in this matter in a file named "AnalyticsInfowars.com.zip" as an attachment to the email transmitted as appearing in **Exhibit B.**

8. I continue to serve as a Consultant for Free Speech Systems, LLC.

9. To my knowledge, there is no way to export the entire Google Analytics raw data, *i.e.* the underlying database, without being an Analytics 360 member. It is my understanding that the cost of becoming an Analytics 360 member is around \$150,000.

10. Free Speech Systems, LLC is not an Analytics 360 member.

11. Infowars, LLC, Infowars Health, LLC, and Prison Planet TV, LLC do not have Google Analytics or social media accounts and never had any. Upon information and belief, Alex Jones never had a personal Google Analytics account.

12. I served as the corporate designee for the deposition of Free Speech Systems, LLC in this matter. In preparation for that deposition, I consulted with various relevant personnel about all notice topics, including social media.

13. Louis Sertucche thereupon recalled the existence of some social media analytics, which were produced to Plaintiffs in this matter.

14. Upon information and belief, no other social media analytics are known to exist.


15. Upon information and belief, prior non-production was inadvertent.

Executed on September 13, 2021


Michael Zimmermann

County of Travis, State of Texas

On this 13 day of September, 2021, before me, the undersigned notary public, personally appeared Michael Zimmermann, proved to me through satisfactory evidence of identification, which were TX Drivers License, to be the person who signed the preceding or attached document in my presence, and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.



Notary Public

My Commission Expires:

09-24-2022

